

# EXHIBIT 8

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: LIQUID ALUMINUM SULFATE  
ANTITRUST LITIGATION

Civil Action No. 16-md-2687  
(MCA)(MAH)

MDL No. 2687

**DECLARATION OF CHARLES E. FERRARA**

I, Charles E. Ferrara, of full age, hereby declare under penalty of perjury as follows:

1. I am a Sr. Business Resource Liaison at the class action notice and settlement administration firm, Angeion Group, LLC (“Angeion”). I am fully familiar with the facts contained herein based upon my personal knowledge.

2. Angeion was retained by the Direct Purchaser Plaintiff (“DPP”) class and appointed by the United States District Court for the District of New Jersey as the Settlement Administrator for the settlements reached between the DPP class and various defendants in the multidistrict proceedings captioned *In re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (MCA)(MAH) (D. NJ).

3. Angeion caused copies of the notices and claim forms of the settlements between the DPP class and the various defendants in those proceedings to be mailed to more than 10,000 direct purchasers of liquid aluminum sulfate that the defendants identified in their purchase records, including numerous purchasers of liquid aluminum sulfate in the State of Illinois. Angeion also published notices of the settlements in various newspapers and trade publications and maintains a dedicated settlement website containing information relating to the settlements ([www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com)).

4. Angeion received claims that were deemed eligible for a distribution from entities in the State of Illinois, including the City of Chicago, the City of Crystal Lake, the City of Decatur, the City of East Moline, the Rend Lake Conservancy District, the City of Rock Island, the City of Salem and the City of West Chicago and the Commonwealth of Virginia, including the City of Chesapeake and the City of Williamsburg. These entities were mailed a distribution check on March 20, 2020. A list of these twenty claimants, the amounts they received, and copies of their claim forms is attached hereto as Exhibit A.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: November 20, 2020

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CHARLES E. FERRARA

# **EXHIBIT A**

## Illinois Virginia Government Agencies Eligible for Distribution

Claim Number	Check Amount	Payee Name	City	State
CANDSCLAIM0065	37,114.07	CITY OF ROCK ISLAND	ROCK ISLAND	IL
CANDSCLAIM0066	33,529.75	REND LAKE CONSERVANCY DISTRICT INTERCITY WATER	BENTON	IL
CHMCLAIM0008	5,313.74	CITY OF LEROY	LEROY	IL
CHMCLAIM0030	3,368.28	CITY OF ALTAMONT	ALTAMONT	IL
CHMCLAIM0051	8,267.93	LAKE COUNTY PUBLIC WATER DISTRICT	ZION	IL
CHMCLAIM0522	4,476.56	CITY OF SALEM,IL	SALEM	IL
CHMCLAIM0525	7,233.78	COUNTRY OF STAFFORD, VIRGINIA	STAFFORD	VA
CHMCLAIM0531	14,345.23	CITY OF CRYSTAL LAKE	CRYSTAL LAKE	IL
GEOCLAIM0016	1,934.87	YORKVILLE -BRISTOL SANITARY DISTRICT	YORKVILLE	IL
GEOCLAIM0018	1,477.36	CITY OF AURORA	AURORA	IL
GEOCLAIM0045	34,270.55	SUMMERFIELD, LEBANON,MASCOUTAH WATER COMMISSION , A MUNICIPAL CORPORATION	O' FALLON	IL
GEOCLAIM0150	1,106.70	CITY OF WILLIAMSBURG	WILLIAMSBURG	VA
GEOCLAIM0199	3,366.16	CITY OF GILLESPIE	GILLESPIE	IL
GEOCLAIM0201	107,609.63	CITY OF CHESAPEAKE	CHESAPEAKE	VA
GEOCLAIM0207	35,321.12	CITY OF DECATUR	DECATUR	IL
GEOCLAIM0254	38,955.74	CITY OF EAST MOLINE	EAST MOLINE	IL
GEOCLAIM0294	6,265.81	CITY OF MATTOON WATER	MATTOON	IL
GEOCLAIM0302	27,811.99	CITY OF ELGIN WATER DEPT	ELGIN	IL
USALCOCLAIM0043	1,769.13	CITY OF WEST CHICAGO	WEST CHICAGO	IL
USALCOCLAIM0752	239,974.86	CITY OF CHICAGO	CHICAGO	IL

Angeion000004

Your claim must be  
postmarked by:  
December 26, 2019

*Liquid Aluminum Sulfate Antitrust Litigation –  
C&S Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
[www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com)

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**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you MUST notify the Settlement Administrator in writing at the address above.

Claimant Names(s) (as the name(s) should appear on check, if eligible for payment):

City of Rock Island

Company

City of Rock Island

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Jason Upton

Mailing Address – Line 1: Street Address/P.O. Box:

2215 16<sup>th</sup> Ave

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

Rock Island

State/Province:

IL

Zip Code:

61201

Country:

Rock Island

Daytime Telephone Number:

309-732-2310

Evening Telephone Number:

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

upton.jason@rigov.org

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

<b>Date of Purchase</b>	<b>Quantity of Alum Purchased Directly from a Defendant</b>	<b>Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)</b>	<b>Proof of Purchase Enclosed</b>
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,345	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Incorporated, American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, and Kenneth A. Ghazey.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART IV – SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V – CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HEREWITH ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

\_\_\_\_\_  
Signature of claimant

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print your name here

\_\_\_\_\_  
Company Name

\_\_\_\_\_  
Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**REMINDER CHECKLIST**

1. Please sign the above certification.
2. Remember to attach only **copies** of acceptable supporting documentation as these documents will not be returned to you.
3. Please do not highlight any portion of the Claim Form or any supporting documents.
4. Keep copies of the completed Claim Form and documentation for your own records.
5. The Settlement Administrator will acknowledge receipt of your Claim Form by mail, within 60 days. Your claim is not deemed filed until you receive an acknowledgement postcard. **IF YOU DO NOT RECEIVE AN ACKNOWLEDGEMENT POSTCARD WITHIN 60 DAYS, PLEASE CALL THE SETTLEMENT ADMINISTRATOR TOLL FREE AT 1-855-338-6128.**
6. If your address changes in the future, or if this Claim Form was sent to an old or incorrect address, please send the Settlement Administrator written notification of your new address.
7. If you have any questions or concerns regarding your claim, please contact the Settlement Administrator at the above address or toll-free at 1-855-338-6128 or visit [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com).

**THIS CLAIM FORM MUST BE MAILED BY PREPAID, FIRST-CLASS MAIL, OR SUBMITTED ONLINE AT [WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM](http://WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM), POSTMARKED OR RECEIVED NO LATER THAN DECEMBER 26, 2019.**

A Claim Form received by the Settlement Administrator shall be deemed to have been submitted when posted, if a postmark date on or before December 26, 2019 is indicated on the envelope and it is mailed First Class, and addressed in accordance with the above instructions. In all other cases, a Claim Form shall be deemed to have been submitted when actually received by the Settlement Administrator.

**It will take a significant amount of time to fully process all of the Claim Forms. Please be patient.**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

In Re: LIQUID ALUMINUM SULFATE  
ANTITRUST LITIGATION

Civil Action No. 16-md-2687 (JLL) (JAD)

**If You Purchased Liquid Aluminum Sulfate In The United States Directly From  
A Defendant From January 1, 1997 Through February 28, 2011,  
You Could Be Affected By Proposed Class Action Settlement**

*A federal court authorized this Notice.*

*This is not a solicitation from a lawyer. You are not being sued.*

- This Notice is being sent to you pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the District of New Jersey (“Court”). The purpose of this Notice is to advise you of the pendency of the class action lawsuit called *In Re: Liquid Aluminum Sulfate Antitrust Litigation* (“Action”) and the proposed partial settlement (the “Settlement”) reached in the Action between Direct Purchaser Class Plaintiffs<sup>1</sup> and settling defendant C&S Chemicals, Inc. (“C&S”).<sup>2</sup> The Court preliminarily approved the Settlement on September 11, 2019. **The Settlement does not release any claims of Direct Purchaser Class Plaintiffs and the other members of the Direct Purchaser Settlement Class (as defined below) against any other Defendant named in the Action.**<sup>3</sup>
- Pursuant to the Settlement, C&S agreed to pay a total of \$1.3 million in cash, payable monthly installments over four years, with 4.5% interest. C&S denies all of Direct Purchaser Class Plaintiffs’ claims and deny all wrongdoing, but have agreed to settle in order to avoid the cost and risk of a trial.
- This lawsuit involves liquid aluminum sulfate or “Alum.” Alum is a chemical utilized by municipalities and industries for a variety of uses including, *inter alia*, treating drinking water, controlling algae in lakes and ponds, treating wastewater, manufacturing paper and pulp and fixing dyes to textiles. The Direct Purchaser Class Plaintiffs allege that C&S participated in a conspiracy – with other Defendants in the Action and unnamed co-conspirators – to allocate territories and/or not to compete for each other’s historical business by rigging bids, allocating customers and fixing, stabilizing, and maintaining the price of Alum sold in the United States from January 1, 1997 to at least February 28, 2011 in violation of the federal antitrust laws. C&S denies all of these claims and have asserted various defenses to the claims. The Court has not made any decision as to the merits of Direct Purchaser Class Plaintiffs’ claims against C&S because the Parties have agreed to settle these claims.
- The Settlement described in this Notice pertain only to direct purchasers of Alum (*i.e.*, those that purchased Alum in the United States directly from a Defendant). There is another lawsuit pending in the same Court that was brought on behalf of indirect purchasers, which are entities that purchased Alum from distributors or from other direct purchasers.

<sup>1</sup> Direct Purchaser Class Plaintiffs are Central Arkansas Water; City of Charlotte, North Carolina; City and County of Denver, Colorado, acting by and through its board of Water Commissioners; Flambeau River Papers, LLC; City of Greensboro, North Carolina; Mobile Area Water and Sewer System; City of Rochester, Minnesota; City of Sacramento, California; SUEZ Water Environmental Services Inc.; SUEZ Water New Jersey Inc.; SUEZ Water Princeton Meadows Inc.; SUEZ Water New York Inc.; SUEZ Water Pennsylvania Inc.; and City of Texarkana, Arkansas, City of Texarkana, Texas, d/b/a Texarkana Water Utilities, and City of Shreveport, Louisiana.

<sup>2</sup> The full terms of the Settlement are set forth in the Settlement Agreement between Direct Purchaser Class Plaintiffs and Defendant C&S and between Direct Purchaser Class Plaintiffs, a copy of which can be viewed on the Settlement website, [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). All capitalized terms used herein and not otherwise defined herein have the meanings set forth in the Settlement Agreement. In the event of any conflicts between the terms of this Notice and the Settlement Agreement, the Settlement Agreement shall control.

<sup>3</sup> The named defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Incorporated, American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, and Kenneth A. Ghazey. (collectively, “Defendants”).

- The Court still has to decide whether to finally approve the Settlement. Approval of the Settlement by the Court will resolve the lawsuit against C&S.
- **Your legal rights will be affected whether or not you act.** This Notice includes important information about the lawsuit and the Settlement.

<b>A SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THESE SETTLEMENT</b>	
<b>SUBMIT A CLAIM FORM POSTMARKED OR SUBMITTED ONLINE NO LATER THAN DECEMBER 26, 2019</b>	If you wish to make a claim against the Settlement Funds, you will need to submit a Claim Form in order to be eligible to receive a payment from the Settlement. The portion, if any, of the Settlement Funds to be allocated to you will be calculated on a <i>pro rata</i> basis based on your eligible purchases of Alum. (See Questions 9-10).
<b>ASK TO BE EXCLUDED BY SUBMITTING A WRITTEN REQUEST FOR EXCLUSION SO THAT IT IS RECEIVED NO LATER THAN OCTOBER 24, 2019</b>	If you ask to be excluded from the Direct Purchaser Settlement Class and the Court approves the Settlement, you will not receive any money from the Settlement. This is the only option that allows you to be part of any other lawsuit against C&S for the claims in this case. (See Question 13).
<b>OBJECT TO THE SETTLEMENT BY SUBMITTING A WRITTEN OBJECTION SO THAT IT IS RECEIVED NO LATER THAN OCTOBER 24, 2019</b>	If you do not like the Settlement, or any part of them, you may write to the Court and explain why you do not like the Settlement. You can only object to the Settlement if you are a Direct Purchaser Settlement Class Member and you do not exclude yourself. (See Question 17).
<b>GO TO THE COURT'S FINAL FAIRNESS HEARING ON NOVEMBER 14, 2019 AT 2:00 PM</b>	If you submit a written objection, you may (but you do not have to) attend the hearing and, at the discretion of the Court, speak to the Court about your objection. (See Questions 19-21).
<b>DO NOTHING</b>	You do not have to take any action to remain part of the Direct Purchaser Settlement Class. (See Question 22). However, by doing nothing, you give up any rights to sue C&S about the claims in this case and you will not receive a payment from the Settlement.

**Your rights and options are explained in more detail in this Notice.  
Please read this Notice carefully and completely.**

## **WHAT THIS NOTICE CONTAINS**

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### SUMMARY OF THE SETTLEMENT

This is a partial settlement. Pursuant to the Settlement, C&S has agreed to pay a total of \$1.3 million in cash, payable in equal monthly installments over four years, plus interest

The net amount of the Settlement Funds, after payment of any taxes, administration expenses, and Court-approved attorneys' fees, expenses and Case Contribution Awards, will be allocated to Direct Purchaser Settlement Class Members, *pro rata*, according to a plan of distribution, approval of which will simultaneously be sought from the Court as part of the Settlement.

As with any litigated case, Direct Purchaser Class Plaintiffs would face an uncertain outcome against C&S if this lawsuit were to continue against them. Throughout this case, Direct Purchaser Class Plaintiffs, on the one hand, and C&S, on the other hand, have disagreed on both liability and damages, and they do not agree on the amount that would be recoverable even if Direct Purchaser Class Plaintiffs were to prevail at trial. Moreover, continued litigation could result in a judgment or verdict against C&S in an amount less than the recovery obtained by the Settlement, or no recovery at all. C&S denies and continue to deny the claims and contentions alleged by Direct Purchaser Class Plaintiffs, that it is liable at all to the Direct Purchaser Settlement Class, or that the Direct Purchaser Settlement Class suffered any damages for which C&S could be legally responsible. Nevertheless, C&S have taken into account the uncertainty and risks inherent in any litigation, particularly in a complex case such as this, and have concluded that it is desirable that the lawsuit be fully and finally settled as to C&S on the terms and conditions set forth in the Settlement Agreement.

### BASIC INFORMATION

#### **1. WHY DID I GET THIS NOTICE?**

You received this Notice because it is believed that you or your company purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011, and therefore, you may be a member of the Direct Purchaser Settlement Class.

The Court has directed that this Notice be sent to you because, as a potential member of the Direct Purchaser Settlement Class, you have the right to know about the Settlement reached in this Action between the Direct Purchaser Class Plaintiffs, on behalf of the Direct Purchaser Settlement Class, and C&S and about all of your options before the Court decides whether to approve the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

The Court in charge of this Action is the United States District Court for the District of New Jersey. The case is called *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD). United States District Court Judge Madeline Cox Arleo is overseeing this Action. The entities who brought this case are the plaintiffs, and the companies and individuals they sued are called defendants.

#### **2. WHAT IS THIS LAWSUIT ABOUT?**

The Direct Purchaser Class Plaintiffs claim that C&S participated in a conspiracy – with other Defendants in the Action and unnamed co-conspirators – to allocate territories and/or not to compete for each other's historical business by rigging bids, allocating customers and fixing, stabilizing, and maintaining the price of Alum sold in the United States from January 1, 1997 to at least February 28, 2011 in violation of the federal antitrust laws. The Direct Purchaser Class Plaintiffs allege that the claimed anticompetitive conduct resulted in artificially inflated prices for Alum. C&S denies all of these claims and have asserted various defenses to the claims. The Court has not made any decision as to the merits of Direct Purchaser Class Plaintiffs' allegations.

#### **3. WHO IS THE SETTLING DEFENDANT?**

The settling defendant is C&S Chemicals, Inc. ("C&S").

#### **4. WHY IS THIS A CLASS ACTION?**

In a class action, one or more individuals or entities, called "class representatives," sue on behalf of others who have similar claims. The class representatives in this case are Central Arkansas Water; City of Charlotte, North Carolina; City and County of Denver, Colorado, acting by and through its board of Water Commissioners; Flambeau River Papers, LLC; City of Greensboro, North Carolina; Mobile Area Water and Sewer System; City of Rochester, Minnesota; City of Sacramento, California; SUEZ Water Environmental Services Inc.; SUEZ Water New Jersey Inc.; SUEZ Water Princeton Meadows

Inc.; SUEZ Water New York Inc.; SUEZ Water Pennsylvania Inc.; City of Texarkana, Arkansas and City of Texarkana, Texas, d/b/a Texarkana Water Utilities, and City of Shreveport, Louisiana (collectively referred to herein as "Direct Purchaser Class Plaintiffs"). The Direct Purchaser Class Plaintiffs and the individuals or entities with similar claims are individually "class members," together comprising a class. One court resolves the issues for all class members, except for those who exclude themselves from the class.

#### 5. WHY ARE THERE SETTLEMENT OF THIS ACTION WITH C&S?

C&S have denied all liability and wrongdoing in this case and have asserted various defenses to the Direct Purchaser Class Plaintiffs' claims. The Court did not decide in favor of the Direct Purchaser Class Plaintiffs or C&S. Instead, both sides agreed to the Settlement. That way, they avoid the cost and risk of a trial, and the Direct Purchaser Settlement Class Members affected will get compensation.

This Settlement is the product of extensive negotiations between lawyers for the Direct Purchaser Class Plaintiffs and C&S. The Direct Purchaser Class Plaintiffs and Interim DPP Lead Counsel think the Settlement is fair and in the best interests of all Direct Purchaser Settlement Class Members.

### WHO IS AFFECTED BY THE SETTLEMENT?

**To see if you are affected by the Settlement, you first have to determine if you are a Direct Purchaser Settlement Class Member.**

#### 6. WHO IS INCLUDED IN THE DIRECT PURCHASER SETTLEMENT CLASS?

The Court has preliminarily certified, for purposes of effectuating the Settlement only, a class consisting of: **all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.** Generally, you are included in the Direct Purchaser Settlement Class if you purchased Alum directly from a Defendant during this period.

Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.

#### 7. WHAT IF I AM STILL NOT SURE WHETHER I AM INCLUDED?

If you are still not sure if you are a Direct Purchaser Settlement Class Member, you can get more information by visiting [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com), or you can get free help by calling or writing Interim DPP Lead Counsel, at the phone number and address listed in Question 23 below. You may also contact the Settlement Administrator, by calling 1-855-338-6128, by emailing [info@CandSliquidaluminumdirectsettlement.com](mailto:info@CandSliquidaluminumdirectsettlement.com), or writing to *Liquid Aluminum Sulfate Antitrust Litigation – C&S Direct Purchaser Settlements*, c/o Settlement Administrator, P.O. Box 30097, Philadelphia, PA 19103.

### THE BENEFITS OF THE SETTLEMENT

#### 8. WHAT DOES THE SETTLEMENT PROVIDE?

C&S has agreed to pay \$1.3 million in cash, payable in monthly installments over a period of four years, plus 4.5% interest. The Settlement Funds will be used to pay: (i) the costs of settlement administration and notice as approved by the Court; (ii) attorneys' fees and expenses, as approved by the Court; and (iii) Case Contribution Awards to Direct Purchaser Class Plaintiffs for litigating the Action on behalf of the Direct Purchaser Settlement Class as approved by the Court. The Settlement Funds after deduction of the foregoing payments is referred to as the "Net Settlement Fund."

#### 9. HOW DO I RECEIVE A PAYMENT?

If you are a Direct Purchaser Settlement Class Member and do not exclude yourself, you may be eligible to receive a payment from the Settlement. **To qualify for a payment from the Settlement, you must submit a Claim Form, which is enclosed with this Notice or available at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com).** Please read the instructions contained in the Claim Form carefully. You must fill out the Claim Form and include all the information the form asks for. Be

sure to sign it, and mail it by first-class mail, or submit it online at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com), postmarked (if mailed) or received (if submitted online) no later than December 26, 2019 to:

*Liquid Aluminum Sulfate Antitrust Litigation – C&S Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103

You may be asked to verify the accuracy of the information provided in your Claim Form. Your claim must be valid to receive money. **If you submitted a Claim Form in connection with the settlement with a prior settlement with the Direct Purchaser Settlement Class, you need not submit an additional Claim Form in connection with the C&S Settlement.**

If the Court approves the Settlement (*see* “The Court’s Fairness Hearing” below), payments from the Settlement Funds will be distributed at a later date to members of the Direct Purchaser Settlement Class who submit valid Claim Forms.

There are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.

**10. HOW MUCH WILL MY PAYMENT BE?**

Direct Purchaser Settlement Class Members who file valid claims will receive their *pro rata* share of the Net Settlement Fund based on: (1) the Direct Purchaser Settlement Class Member’s eligible purchases of Alum; (2) the total money available to pay all claims; (3) the total dollar value of all valid claims submitted; and (4) the cost of settlement administration and notice and the Court-awarded attorneys’ fees, expenses and Case Contribution Awards (*see* Question 16 below). In other words, the Net Settlement Fund shall be allocated on a *pro rata* basis based on the total dollar value of each Direct Purchaser Settlement Class Member’s eligible purchase(s) of Alum in proportion to the total dollar value of all valid claims submitted.

Interim DPP Lead Counsel’s proposed plan for distributing the Net Settlement Fund to Direct Purchaser Settlement Class (“Plan of Distribution”) will be presented to the Court with its papers in support of final approval of the Settlement. Details about the proposed Plan of Distribution will be available at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com) starting no later than October 17, 2019.

**Important!** Direct Purchaser Settlement Class Members who exclude themselves in accordance with Question 13 below will not be able to share in the distribution from the Net Settlement Fund.

**11. WHEN WILL I RECEIVE A PAYMENT?**

There is no date certain for making payments from the Settlement Funds. The Net Settlement Fund will be distributed to eligible Direct Purchaser Settlement Class Members after the Court grants final approval to the Settlement, all claims have been fully processed by the Settlement Administrator and the Court has authorized distribution of the Net Settlement Fund. Updates on this process will be made available at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com).

**Please Note:** The Settlement may be terminated on several grounds, including if the Court does not approve or materially modifies the Settlement. Should the Settlement be terminated, the Settlement Funds less the cost of settlement administration and notice will be returned to C&S and this Action will proceed against C&S as if the Settlement had not been reached. If the Settlement is terminated, there will be no payments made to Direct Purchaser Settlement Class Members.

**12. WHAT AM I GIVING UP TO RECEIVE A PAYMENT?**

Unless you exclude yourself, you will remain in the Direct Purchaser Settlement Class, and that means that you cannot sue, continue to sue, or be part of any other lawsuit against C&S about the legal issues in this case. It also means that all of the Court’s orders will apply to you and legally bind you. As set forth in paragraphs 14 of the Settlement Agreement:

- **Release:** Upon Final Judgment and in consideration of payment of the Settlement Funds into the Direct Purchaser Escrow Account, and for other valuable consideration, the C&S Released Parties<sup>4</sup> shall be completely released, acquitted, and forever discharged from any and all claims, demands, actions, suits, causes of action, whether class, individual, or otherwise in nature (whether or not any Direct Purchaser Settlement Class Member has objected to the Settlement or

<sup>4</sup> “C&S Released Parties” means C&S, its predecessors or assigns, and their current and former, direct and indirect parents, subsidiaries, affiliates, and all of their directors, officers, managers, members, agents, representatives and employees.

makes a claim upon or participates in the Settlement Funds, whether directly, representatively, derivatively or in any other capacity) that the Releasing Parties ever had, now has, or hereafter can, shall, or may ever have, that exist as of the date of Final Judgment, on account of, or in any way arising out of, any and all known and unknown, foreseen and unforeseen, suspected or unsuspected, actual or contingent, liquidated or unliquidated claims, injuries, damages, and the consequences thereof in any way arising out of or relating in any way to the facts and circumstances alleged in the Consolidated Proceedings ("Released Claims"), provided, however, that nothing herein shall release claims involving any negligence, personal injury, breach of product warranty, bailment, failure to deliver lost goods, damaged or delayed goods, product defect, or similar claims relating to Alum. During the period after the expiration of the deadline for submitting an opt-out notice, as determined by the Court, and prior to Final Judgment, all Releasing Parties shall be preliminarily enjoined and barred from asserting any Released Claims against the C&S Released Parties. C&S further agrees that it will not file any suit against the Releasing Parties and their current and former, direct and indirect, parents, subsidiaries, affiliates, directors, officers, shareholders, and employees arising out of or relating to the Released Claims. The release of the Released Claims will become effective as to all Releasing Parties upon Final Judgment. Upon Final Judgment, the Releasing Parties further agree that they will not file any other suit against the C&S Released Parties arising out of or relating to the Released Claims.

- **Further Release:** In addition to the provisions of Paragraphs 14, the Releasing Parties expressly waive and release, solely with respect to the Released Claims, upon Final Judgment, any and all provisions, rights, and benefits conferred by Section 1542 of the California Civil Code, which states:

CERTAIN CLAIMS NOT AFFECTED BY GENERAL RELEASE. A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS WHICH THE CREDITOR DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE, WHICH IF KNOWN BY HIM OR HER MUST HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR;

or by any law of any state or territory of the United States, or principle of common law, which is similar, comparable, or equivalent to Section 1542 of the California Civil Code. Each Releasing Party may hereafter discover facts other than or different from those which he, she, or it knows or believes to be true with respect to the claims which are released pursuant to the provisions of Paragraphs 15 and 16, but each Releasing Party hereby expressly waives and fully, finally, and forever settles and releases, upon Final Judgment, any known or unknown, suspected or unsuspected, contingent or non-contingent claim that the Releasing Parties have agreed to release pursuant to Paragraphs 14, whether or not concealed or hidden, without regard to the subsequent discovery or existence of such different or additional facts.

- **Reservation of Claims.** The Parties intend by this Agreement to release only the C&S Released Parties with respect to the Released Claims. The Parties specifically do not intend this Agreement, or any part hereof or any other aspect of the proposed Settlement, to compromise or otherwise affect in any way any rights the Releasing Parties have or may have against any other person, firm, association, or corporation whatsoever, including, but not limited to the Non-Settling Defendants. The release set forth in Paragraphs 14 and 15 above is not intended to and shall not release any claims other than the Released Claims. The sales of Alum by C&S in the United States from January 1, 1997 through at least February 28, 2011 shall remain in the cases against the Non-Settling Defendants in the Consolidated Proceedings as a basis for damage claims and shall be part of any joint and several liability claims against Non-Settling Defendants in the Consolidated Proceedings or other persons or entities other than the C&S Released Parties.

### **EXCLUDING YOURSELF FROM THE DIRECT PURCHASER SETTLEMENT CLASS**

If you want to keep the right to sue or continue to sue C&S on your own about the legal issues being resolved by the Settlement, then you must take steps to get out of the Direct Purchaser Settlement Class. This is called excluding yourself - or sometimes referred to as "opting out." If you opt out of the Direct Purchaser Settlement Class, you will not receive any payment from the Net Settlement Fund.

#### **13. HOW DO I GET OUT OF THE DIRECT PURCHASER SETTLEMENT CLASS?**

To exclude yourself, you must send a letter saying that you want to be excluded from the Direct Purchaser Settlement Class. The letter must include the following information: (i) a statement indicating that you want to be excluded from the Direct Purchaser Settlement Class in *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD); (ii) your name, address, telephone number, and your signature; (iii) all trade names or business names and

all addresses (including any addresses that have received shipments of Alum from a Defendant) you or your business have used, as well as any subsidiaries or affiliates who are requesting to be excluded from the Direct Purchaser Settlement Class, and (iv) the total purchases of Alum in dollars by you during the Class Period. Your letter must be **postmarked by October 24, 2019** and sent to:

Class Action Opt Out C&S  
Attn: Liquid Aluminum Sulfate Antitrust Litigation – Direct Purchaser Settlements  
P.O. Box 30097  
Philadelphia, PA 19103

**If you ask to be excluded from the Direct Purchaser Settlement Class you will not get any payment from the Net Settlement Fund created by the Settlement and you cannot object to the Settlement. If you want to receive a payment from the Settlement, do not exclude yourself.**

**Important - Please Note:** Unless you exclude yourself, if the Court approves the Settlement, you give up any right to sue C&S for the claims that the Settlement resolves. If you have a pending lawsuit against C&S involving the same legal issues in this case, speak to your lawyer in that case immediately. You must exclude yourself from the Direct Purchaser Settlement Class in order to continue your own lawsuit against C&S.

**Warning!** If your letter is sent after the deadline, your request for exclusion will be considered invalid and you will not be excluded from the Direct Purchaser Settlement Class. You cannot exclude yourself by telephone or email.

**14. IF I EXCLUDE MYSELF, CAN I RECEIVE MONEY FROM THE SETTLEMENT?**

No. If you decide to exclude yourself from the Direct Purchaser Settlement Class, you will not be able to receive money from the Settlement.

**THE LAWYERS REPRESENTING YOU**

**15. DO I HAVE A LAWYER IN THIS CASE?**

Yes. The Court appointed James E. Cecchi, Esq. of Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. as Interim DPP Lead Counsel to represent the Direct Purchaser Settlement Class on an interim basis and for purposes of the Settlement.

If you want to be represented by your own lawyer and have that lawyer appear in court for you concerning the Settlement, you may hire one at your own expense. If you hire your own lawyer, you must tell the Court and send a copy of your notice to Interim DPP Lead Counsel at the address set forth in Question 17 below.

**16. HOW WILL THE LAWYERS BE PAID?**

You are not personally responsible for payment of attorneys' fees or expenses. Interim DPP Lead Counsel will seek an award of attorneys' fees up to 33.3% of the total consideration made available to the Direct Purchaser Settlement Class to compensate all of the lawyers and their law firms that have worked on this Action since its inception. Interim DPP Lead Counsel will also seek reimbursement of the costs and expenses advanced on behalf of the Direct Purchaser Settlement Class. If the Court approves Interim DPP Lead Counsel's requests, these amounts will be deducted from the Settlement Funds.

Interim DPP Lead Counsel will also seek Case Contribution Awards of no more than \$20,000 for each of the Direct Purchaser Class Plaintiffs who served as proposed class representatives while the case was pending. If awarded, these amounts will also be deducted from the Settlement Funds.

**Important!** Interim DPP Lead Counsel's request for attorneys' fees, expenses and Case Contribution Awards will be on file with the Court, and available for review at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com) as of October 17, 2019, 2019.

**OBJECTING TO THE SETTLEMENT, THE PLAN OF DISTRIBUTION AND/OR THE REQUEST FOR  
ATTORNEYS' FEES, EXPENSES AND CASE CONTRIBUTION AWARDS**

**17. HOW DO I TELL THE COURT THAT I DON'T LIKE THE SETTLEMENT, PLAN OF DISTRIBUTION AND/OR THE REQUEST FOR ATTORNEYS' FEES, EXPENSES AND CASE CONTRIBUTION AWARDS?**

If you are a Direct Purchaser Settlement Class Member (and have not excluded yourself), you may tell the Court that you object to (or disagree with) all or part of the Settlement, Plan of Distribution, and/or Interim DPP Lead Counsel's request for an award of attorneys' fees, reimbursement of expenses, and/or Case Contribution Awards to Direct Purchaser Class Plaintiffs. You must give reasons for your objection(s). The Court will consider your objections when it decides whether or not to finally approve the Settlement.

Your written objection must include the following: (i) a statement indicating that you object to the Settlement, the Plan of Distribution and/or the request for attorneys' fees, expenses, or Case Contribution Awards, in *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD); (ii) your name, address, telephone number, and your signature; (iii) the reasons you object and all documents and writings that you want the Court to consider; and (iv) proof of your membership in the Direct Purchaser Settlement Class, such as invoices showing that you satisfy the definition in Question 6. If you intend to appear at the final fairness hearing, you must also include a notice of intention to appear (see Question 21).

To object, you must file your written objection(s) with the Court at the following address **by October 24, 2019**:

Clerk of Court  
Martin Luther King, Jr. Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

You must also send a copy of your written objection(s) to Interim DPP Lead Counsel and Counsel for C&S at the following addresses **by October 24, 2019**:

<b>Interim DPP Lead Counsel</b>	<b>Counsel for C&amp;S</b>
James E. Cecchi, Esq. <b>Carella, Byrne, Cecchi, Olstein, Brody &amp; Agnello, P.C.</b> 5 Becker Farm Road Roseland, NJ 07068	John D. "Randy" Dalbey <b>Chilivis, Cochran, Larkins &amp; Bever LLP</b> 3127 Maple Drive, NE Atlanta, Georgia 30305

**18. WHAT IS THE DIFFERENCE BETWEEN OBJECTING AND EXCLUDING?**

Objecting is simply telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you stay in the Direct Purchaser Settlement Class. Excluding yourself, or "opting out," means that you are removing yourself from the Direct Purchaser Settlement Class and will have no right to proceeds from the Settlement. If you exclude yourself, you also have no right to object to the Settlement, because the Settlement no longer affect you.

**THE COURT'S FAIRNESS HEARING**

**19. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?**

The Court will hold a Fairness Hearing at **2:00 p.m. on November 14, 2019**, at the United States District Court for the District of New Jersey, Martin Luther King, Jr. Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101. At the Fairness Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and whether to approve the Plan of Distribution and the request for attorneys' fees, expenses, and Case Contribution Awards. The Court will listen to Direct Purchaser Settlement Class Members who have asked to speak at the hearing. If there are objections or comments, the Court will consider them at that time. After the hearing, the Court will decide whether to approve the Settlement, the Plan of Distribution, and the request for attorneys' fees, expenses, and Case Contribution Awards. We do not know how long a decision will take to be made.

**Important!** The time and date of the Fairness Hearing may change without additional mailed or publication notice. For updated information on the Fairness Hearing, visit [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com).

**20. DO I HAVE TO COME TO THE HEARING?**

No. Interim DPP Lead Counsel will be prepared to answer any questions the Court may have at the Fairness Hearing. However, you are welcome to attend the hearing at your own expense. If you send an objection, you do not have to come to court to explain. As long as you mailed your written objection on time as set out in this Notice, the Court will consider it. You may also pay another lawyer to attend the hearing, but it is not required.

**21. MAY I SPEAK AT THE HEARING?**

You may ask the Court for permission to speak at the Fairness Hearing. If you wish to do so, you must file a Notice of Intention to Appear with the Court at the following address **by October 24, 2019**:

Clerk of Court  
Martin Luther King, Jr. Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

You must also mail copies of the Notice of Intention to Appear to the attorneys listed in Question 17 above, no later than **October 24, 2019**.

Your Notice of Intention to Appear must include (i) the case caption, *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD); (ii) your name, address, and telephone number, and (iii) personal information for other people (including lawyers) who want to speak at the hearing.

**IF YOU DO NOTHING**

**22. WHAT HAPPENS IF I DO NOTHING AT ALL?**

If you do nothing, you will remain in the Direct Purchaser Settlement Class, and you will be bound by the terms of the Settlement and will forego any right to sue, or be part of any other lawsuit against C&S over the "Released Claims."

If you remain in the Direct Purchaser Settlement Class, to qualify for a payment from the Settlement you must submit a Claim Form, a copy of which is enclosed with this Notice. See Question 9 above.

**GETTING MORE INFORMATION**

**23. WHERE CAN I GET MORE INFORMATION?**

This Notice summarizes the Settlement. More details are in the Settlement Agreement. You can review the Settlement Agreement and other documents related to the Action by visiting [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). In addition, Interim DPP Lead Counsel's motions for final approval of the Settlement, Plan of Distribution and request for attorneys' fees, expenses, and Case Contribution Awards are currently due to be filed with the Court by October 17, 2019 and will be available for review on the website.

If you have questions or want more information, you may contact the Settlement Administrator at *Liquid Aluminum Sulfate Antitrust Litigation – C&S Direct Purchaser Settlements*, c/o Settlement Administrator, P.O. Box 30097, Philadelphia, PA 19103; 1-855-338-6128. You can also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

**PLEASE DO NOT WRITE OR CALL THE COURT  
OR THE CLERK'S OFFICE FOR INFORMATION.**

DATED: SEPTEMBER 11, 2019

BY ORDER OF THE COURT  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

**Your claim must be  
postmarked by:  
December 26, 2019**

*Liquid Aluminum Sulfate Antitrust Litigation –  
C&S Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
[www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com)

**CAS**

**CLAIM FORM FOR SETTLEMENT WITH C&S CHEMICALS**

**IMPORTANT: PLEASE READ BEFORE COMPLETING THIS CLAIM FORM**

To be eligible for a payment from this Settlement, you must be a Direct Purchaser Settlement Class Member, *i.e.*, you must have purchased liquid aluminum sulfate ("Alum") in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.

This Claim Form must be completed and returned by Direct Purchaser Settlement Class Members who seek to receive a payment from partial settlements ("Settlements") in the action captioned *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD) ("Action").

THIS CLAIM FORM MUST BE COMPLETED AND MAILED BY PREPAID, FIRST-CLASS MAIL TO THE ABOVE ADDRESS, OR SUBMITTED ONLINE AT [WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM](http://WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM), **POSTMARKED OR RECEIVED NO LATER THAN DECEMBER 26, 2019** IN ORDER TO BE ELIGIBLE TO RECEIVE A SHARE OF THE NET SETTLEMENT FUND IN CONNECTION WITH THE SETTLEMENTS. **IF YOU PREVIOUSLY SUBMITTED A CLAIM FORM WITH RESPECT TO ANOTHER DIRECT PURCHASER CLASS SETTLEMENT, IT IS NOT NECESSARY TO FILE AN ADDITIONAL CLAIM FORM TO PARTICIPATE IN THE SETTLEMENT WITH C&S.**

FAILURE TO SUBMIT YOUR CLAIM FORM BY THE DATE SPECIFIED ABOVE WILL SUBJECT YOUR CLAIM TO REJECTION AND MAY PRECLUDE YOU FROM BEING ELIGIBLE TO RECEIVE ANY MONEY IN CONNECTION WITH THE SETTLEMENT.

**DO NOT MAIL OR DELIVER YOUR CLAIM FORM TO THE COURT, THE PARTIES, OR THEIR COUNSEL. SUBMIT YOUR CLAIM FORM ONLY TO THE SETTLEMENT ADMINISTRATOR AT THE ADDRESS SET FORTH ABOVE.**

If you have questions regarding your Claim Form, please call 1-855-338-6128 or email [info@CandSliquidaluminumdirectsettlement.com](mailto:info@CandSliquidaluminumdirectsettlement.com). Members of the Direct Purchaser Settlement Class who do not timely and validly seek exclusion from the Direct Purchaser Settlement Class in accordance with the instructions set forth in the Notice will be bound by the judgment entered approving these Settlement as to C&S regardless of whether they submit a Claim Form.

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*\*Pages 3, 4 and 5 of this Claim Form must be completed and returned to the Settlement Administrator*

## PART I – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice that accompanies this Claim Form. The Notice describes the proposed Settlement with C&S, how Direct Purchaser Settlement Class Members are affected by the Settlement, and the manner in which the Net Settlement Fund will be distributed if the Settlement is approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.
2. **To be eligible for a payment from the Settlement, you must be a Direct Purchaser Settlement Class Member. The Direct Purchaser Settlement Class is defined as all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.<sup>1</sup>** Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.
3. **Important - Please Note:** This Claim Form does not pertain to the settlement involving the indirect purchasers. **DO NOT SUBMIT THIS CLAIM FORM IF YOU ARE AN INDIRECT PURCHASER.**
4. By submitting this Claim Form, you will be making a request to share in the proceeds of the Settlement described in the Notice. **IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER (see definition of Direct Purchaser Settlement Class on page 5 of the Notice), OR IF YOU SUBMITTED A REQUEST FOR EXCLUSION FROM THE DIRECT PURCHASER SETTLEMENT CLASS, DO NOT SUBMIT A CLAIM FORM. YOU MAY NOT PARTICIPATE IN THE SETTLEMENT IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER. THUS, IF YOU ARE EXCLUDED FROM THE DIRECT PURCHASER SETTLEMENT CLASS, ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.**
5. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.
6. Please be aware that there are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.
7. If the Court approves the Settlement, payments to eligible Direct Purchaser Settlement Class Members will be made after the Court grants final approval to the Settlement, after all appeals are resolved, and after the completion of all claims processing. This process could take substantial time. Please be patient.
8. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator, at the above address or by toll-free phone at 1-855-338-6128, or you may download the documents from the website [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). You may also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

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<sup>1</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Incorporated, American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, and Kenneth A. Ghazey.

**Your claim must be  
postmarked by:  
December 26, 2019**

*Liquid Aluminum Sulfate Antitrust Litigation –  
C&S Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
[www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com)

**CAS**

**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you MUST notify the Settlement Administrator in writing at the address above.

Claimant Names(s) (as the name(s) should appear on check, if eligible for payment):

Rend Lake Conservancy District

Intercity Water

Company

Rend Lake Conservancy District

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Larry Sanders, General Counsel

Mailing Address – Line 1: Street Address/P.O. Box:

11231 Marcam Branch Rd

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

P.O. Box 907

City:

Benton

State/Province:

IL

Zip Code:

62812

Country:

USA

Daytime Telephone Number:

618-439-4321

Evening Telephone Number:

618-922-4538

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

Sanders@RendLake.org

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased Directly from a Defendant	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: XX TONS	\$12,345	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>

See Exhibit A  
Attached  
Still searching archives  
for 1997-2007 Purchases  
Records believed to  
have been made.

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Incorporated, American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, and Kenneth A. Ghazey.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART IV – SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

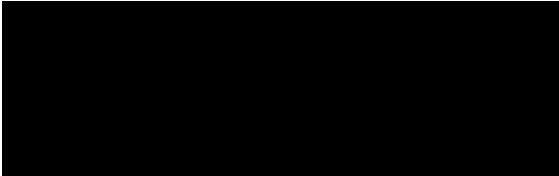
By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V – CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HERewith ARE TRUE AND CORRECT COPIES OF WHAT THEY



12/2/19  
Date

J. Lawrence Sanders

Print your name here

Rend Lake Conservancy District AKA Intereity Water

Company Name

General Counsel

Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**REMINDER CHECKLIST**

1. Please sign the above certification.
2. Remember to attach only **copies** of acceptable supporting documentation as these documents will not be returned to you.
3. Please do not highlight any portion of the Claim Form or any supporting documents.
4. Keep copies of the completed Claim Form and documentation for your own records.
5. The Settlement Administrator will acknowledge receipt of your Claim Form by mail, within 60 days. Your claim is not deemed filed until you receive an acknowledgement postcard. **IF YOU DO NOT RECEIVE AN ACKNOWLEDGEMENT POSTCARD WITHIN 60 DAYS, PLEASE CALL THE SETTLEMENT ADMINISTRATOR TOLL FREE AT 1-855-338-6128.**
6. If your address changes in the future, or if this Claim Form was sent to an old or incorrect address, please send the Settlement Administrator written notification of your new address.
7. If you have any questions or concerns regarding your claim, please contact the Settlement Administrator at the above address or toll-free at 1-855-338-6128 or visit [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com).

**THIS CLAIM FORM MUST BE MAILED BY PREPAID, FIRST-CLASS MAIL, OR SUBMITTED ONLINE AT [WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM](http://WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM), POSTMARKED OR RECEIVED NO LATER THAN DECEMBER 26, 2019.**

A Claim Form received by the Settlement Administrator shall be deemed to have been submitted when posted, if a postmark date on or before December 26, 2019 is indicated on the envelope and it is mailed First Class, and addressed in accordance with the above instructions. In all other cases, a Claim Form shall be deemed to have been submitted when actually received by the Settlement Administrator.

**It will take a significant amount of time to fully process all of the Claim Forms. Please be patient.**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

RECEIVED

SEP 30 2019

REND LAKE

In Re: LIQUID ALUMINUM SULFATE  
ANTITRUST LITIGATION

Civil Action No. 16-md-02687 (JLE/DAD)

**If You Purchased Liquid Aluminum Sulfate In The United States Directly From  
A Defendant From January 1, 1997 Through February 28, 2011,  
You Could Be Affected By Proposed Class Action Settlement**

*A federal court authorized this Notice.*

*This is not a solicitation from a lawyer. You are not being sued.*

- This Notice is being sent to you pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the District of New Jersey (“Court”). The purpose of this Notice is to advise you of the pendency of the class action lawsuit called *In Re: Liquid Aluminum Sulfate Antitrust Litigation* (“Action”) and the proposed partial settlement (the “Settlement”) reached in the Action between Direct Purchaser Class Plaintiffs<sup>1</sup> and settling defendant C&S Chemicals, Inc. (“C&S”).<sup>2</sup> The Court preliminarily approved the Settlement on September 11, 2019. **The Settlement does not release any claims of Direct Purchaser Class Plaintiffs and the other members of the Direct Purchaser Settlement Class (as defined below) against any other Defendant named in the Action.**<sup>3</sup>
- Pursuant to the Settlement, C&S agreed to pay a total of \$1.3 million in cash, payable monthly installments over four years, with 4.5% interest. C&S denies all of Direct Purchaser Class Plaintiffs’ claims and deny all wrongdoing, but have agreed to settle in order to avoid the cost and risk of a trial.
- This lawsuit involves liquid aluminum sulfate or “Alum.” Alum is a chemical utilized by municipalities and industries for a variety of uses including, *inter alia*, treating drinking water, controlling algae in lakes and ponds, treating wastewater, manufacturing paper and pulp and fixing dyes to textiles. The Direct Purchaser Class Plaintiffs allege that C&S participated in a conspiracy – with other Defendants in the Action and unnamed co-conspirators – to allocate territories and/or not to compete for each other’s historical business by rigging bids, allocating customers and fixing, stabilizing, and maintaining the price of Alum sold in the United States from January 1, 1997 to at least February 28, 2011 in violation of the federal antitrust laws. C&S denies all of these claims and have asserted various defenses to the claims. The Court has not made any decision as to the merits of Direct Purchaser Class Plaintiffs’ claims against C&S because the Parties have agreed to settle these claims.
- The Settlement described in this Notice pertain only to **direct** purchasers of Alum (*i.e.*, those that purchased Alum in the United States directly from a Defendant). There is another lawsuit pending in the same Court that was brought on behalf of **indirect** purchasers, which are entities that purchased Alum from distributors or from other direct purchasers.

<sup>1</sup> Direct Purchaser Class Plaintiffs are Central Arkansas Water; City of Charlotte, North Carolina; City and County of Denver, Colorado, acting by and through its board of Water Commissioners; Flambeau River Papers, LLC; City of Greensboro, North Carolina; Mobile Area Water and Sewer System; City of Rochester, Minnesota; City of Sacramento, California; SUEZ Water Environmental Services Inc.; SUEZ Water New Jersey Inc.; SUEZ Water Princeton Meadows Inc.; SUEZ Water New York Inc.; SUEZ Water Pennsylvania Inc.; and City of Texarkana, Arkansas, City of Texarkana, Texas, d/b/a Texarkana Water Utilities, and City of Shreveport, Louisiana.

<sup>2</sup> The full terms of the Settlement are set forth in the Settlement Agreement between Direct Purchaser Class Plaintiffs and Defendant C&S and between Direct Purchaser Class Plaintiffs, a copy of which can be viewed on the Settlement website, [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). All capitalized terms used herein and not otherwise defined herein have the meanings set forth in the Settlement Agreement. In the event of any conflicts between the terms of this Notice and the Settlement Agreement, the Settlement Agreement shall control.

<sup>3</sup> The named defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Incorporated, American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, and Kenneth A. Ghazey. (collectively, “Defendants”).

- The Court still has to decide whether to finally approve the Settlement. Approval of the Settlement by the Court will resolve the lawsuit against C&S.
- **Your legal rights will be affected whether or not you act.** This Notice includes important information about the lawsuit and the Settlement.

<b>A SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THESE SETTLEMENT</b>	
<b>SUBMIT A CLAIM FORM POSTMARKED OR SUBMITTED ONLINE NO LATER THAN DECEMBER 26, 2019</b>	If you wish to make a claim against the Settlement Funds, you will need to submit a Claim Form in order to be eligible to receive a payment from the Settlement. The portion, if any, of the Settlement Funds to be allocated to you will be calculated on a <i>pro rata</i> basis based on your eligible purchases of Alum. (See Questions 9-10).
<b>ASK TO BE EXCLUDED BY SUBMITTING A WRITTEN REQUEST FOR EXCLUSION SO THAT IT IS RECEIVED NO LATER THAN OCTOBER 24, 2019</b>	If you ask to be excluded from the Direct Purchaser Settlement Class and the Court approves the Settlement, you will not receive any money from the Settlement. This is the only option that allows you to be part of any other lawsuit against C&S for the claims in this case. (See Question 13).
<b>OBJECT TO THE SETTLEMENT BY SUBMITTING A WRITTEN OBJECTION SO THAT IT IS RECEIVED NO LATER THAN OCTOBER 24, 2019</b>	If you do not like the Settlement, or any part of them, you may write to the Court and explain why you do not like the Settlement. You can only object to the Settlement if you are a Direct Purchaser Settlement Class Member and you do not exclude yourself. (See Question 17).
<b>GO TO THE COURT'S FINAL FAIRNESS HEARING ON NOVEMBER 14, 2019 AT 2:00 PM</b>	If you submit a written objection, you may (but you do not have to) attend the hearing and, at the discretion of the Court, speak to the Court about your objection. (See Questions 19-21).
<b>DO NOTHING</b>	You do not have to take any action to remain part of the Direct Purchaser Settlement Class. (See Question 22). However, by doing nothing, you give up any rights to sue C&S about the claims in this case and you will not receive a payment from the Settlement.

**Your rights and options are explained in more detail in this Notice.  
Please read this Notice carefully and completely.**

## WHAT THIS NOTICE CONTAINS

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## SUMMARY OF THE SETTLEMENT

This is a partial settlement. Pursuant to the Settlement, C&S has agreed to pay a total of \$1.3 million in cash, payable in equal monthly installments over four years, plus interest

The net amount of the Settlement Funds, after payment of any taxes, administration expenses, and Court-approved attorneys' fees, expenses and Case Contribution Awards, will be allocated to Direct Purchase Settlement Class Members, *pro rata*, according to a plan of distribution, approval of which will simultaneously be sought from the Court as part of the Settlement.

As with any litigated case, Direct Purchaser Class Plaintiffs would face an uncertain outcome against C&S if this lawsuit were to continue against them. Throughout this case, Direct Purchaser Class Plaintiffs, on the one hand, and C&S, on the other hand, have disagreed on both liability and damages, and they do not agree on the amount that would be recoverable even if Direct Purchaser Class Plaintiffs were to prevail at trial. Moreover, continued litigation could result in a judgment or verdict against C&S in an amount less than the recovery obtained by the Settlement, or no recovery at all. C&S denies and continues to deny the claims and contentions alleged by Direct Purchaser Class Plaintiffs, that it is liable at all to the Direct Purchaser Settlement Class, or that the Direct Purchaser Settlement Class suffered any damages for which C&S could be legally responsible. Nevertheless, C&S has taken into account the uncertainty and risks inherent in any litigation, particularly in a complex case such as this, and has concluded that it is desirable that the lawsuit be fully and finally settled as to C&S on the terms and conditions set forth in the Settlement Agreement.

## BASIC INFORMATION

### **1. WHY DID I GET THIS NOTICE?**

You received this Notice because it is believed that you or your company purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011, and therefore, you may be a member of the Direct Purchaser Settlement Class.

The Court has directed that this Notice be sent to you because, as a potential member of the Direct Purchaser Settlement Class, you have the right to know about the Settlement reached in this Action between the Direct Purchaser Class Plaintiffs, on behalf of the Direct Purchaser Settlement Class, and C&S and about all of your options before the Court decides whether to approve the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

The Court in charge of this Action is the United States District Court for the District of New Jersey. The case is called *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD). United States District Court Judge Madeline Cox Arleo is overseeing this Action. The entities who brought this case are the plaintiffs, and the companies and individuals they sued are called defendants.

### **2. WHAT IS THIS LAWSUIT ABOUT?**

The Direct Purchaser Class Plaintiffs claim that C&S participated in a conspiracy – with other Defendants in the Action and unnamed co-conspirators – to allocate territories and/or not to compete for each other's historical business by rigging bids, allocating customers and fixing, stabilizing, and maintaining the price of Alum sold in the United States from January 1, 1997 to at least February 28, 2011 in violation of the federal antitrust laws. The Direct Purchaser Class Plaintiffs allege that the claimed anticompetitive conduct resulted in artificially inflated prices for Alum. C&S denies all of these claims and has asserted various defenses to the claims. The Court has not made any decision as to the merits of Direct Purchaser Class Plaintiffs' allegations.

### **3. WHO IS THE SETTLING DEFENDANT?**

The settling defendant is C&S Chemicals, Inc. ("C&S").

### **4. WHY IS THIS A CLASS ACTION?**

In a class action, one or more individuals or entities, called "class representatives," sue on behalf of others who have similar claims. The class representatives in this case are Central Arkansas Water; City of Charlotte, North Carolina; City and County of Denver, Colorado, acting by and through its board of Water Commissioners; Flambeau River Papers, LLC; City of Greensboro, North Carolina; Mobile Area Water and Sewer System; City of Rochester, Minnesota; City of Sacramento, California; SUEZ Water Environmental Services Inc.; SUEZ Water New Jersey Inc.; SUEZ Water Princeton Meadows

Inc.; SUEZ Water New York Inc.; SUEZ Water Pennsylvania Inc.; City of Texarkana, Arkansas and City of Texarkana, Texas, d/b/a Texarkana Water Utilities, and City of Shreveport, Louisiana (collectively referred to herein as "Direct Purchaser Class Plaintiffs"). The Direct Purchaser Class Plaintiffs and the individuals or entities with similar claims are individually "class members," together comprising a class. One court resolves the issues for all class members, except for those who exclude themselves from the class.

**5. WHY ARE THERE SETTLEMENT OF THIS ACTION WITH C&S?**

C&S have denied all liability and wrongdoing in this case and have asserted various defenses to the Direct Purchaser Class Plaintiffs' claims. The Court did not decide in favor of the Direct Purchaser Class Plaintiffs or C&S. Instead, both sides agreed to the Settlement. That way, they avoid the cost and risk of a trial, and the Direct Purchaser Settlement Class Members affected will get compensation.

This Settlement is the product of extensive negotiations between lawyers for the Direct Purchaser Class Plaintiffs and C&S. The Direct Purchaser Class Plaintiffs and Interim DPP Lead Counsel think the Settlement is fair and in the best interests of all Direct Purchaser Settlement Class Members.

**WHO IS AFFECTED BY THE SETTLEMENT?**

**To see if you are affected by the Settlement, you first have to determine if you are a Direct Purchaser Settlement Class Member.**

**6. WHO IS INCLUDED IN THE DIRECT PURCHASER SETTLEMENT CLASS?**

The Court has preliminarily certified, for purposes of effectuating the Settlement only, a class consisting of: **all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.** Generally, you are included in the Direct Purchaser Settlement Class if you purchased Alum directly from a Defendant during this period.

Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.

**7. WHAT IF I AM STILL NOT SURE WHETHER I AM INCLUDED?**

If you are still not sure if you are a Direct Purchaser Settlement Class Member, you can get more information by visiting [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com), or you can get free help by calling or writing Interim DPP Lead Counsel, at the phone number and address listed in Question 23 below. You may also contact the Settlement Administrator, by calling 1-855-338-6128, by emailing [info@CandSLiquidaluminumdirectsettlement.com](mailto:info@CandSLiquidaluminumdirectsettlement.com), or writing to *Liquid Aluminum Sulfate Antitrust Litigation – C&S Direct Purchaser Settlements*, c/o Settlement Administrator, P.O. Box 30097, Philadelphia, PA 19103.

**THE BENEFITS OF THE SETTLEMENT**

**8. WHAT DOES THE SETTLEMENT PROVIDE?**

C&S has agreed to pay \$1.3 million in cash, payable in monthly installments over a period of four years, plus 4.5% interest. The Settlement Funds will be used to pay: (i) the costs of settlement administration and notice as approved by the Court; (ii) attorneys' fees and expenses, as approved by the Court; and (iii) Case Contribution Awards to Direct Purchaser Class Plaintiffs for litigating the Action on behalf of the Direct Purchaser Settlement Class as approved by the Court. The Settlement Funds after deduction of the foregoing payments is referred to as the "Net Settlement Fund."

**9. HOW DO I RECEIVE A PAYMENT?**

If you are a Direct Purchaser Settlement Class Member and do not exclude yourself, you may be eligible to receive a payment from the Settlement. **To qualify for a payment from the Settlement, you must submit a Claim Form, which is enclosed with this Notice or available at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com).** Please read the instructions contained in the Claim Form carefully. You must fill out the Claim Form and include all the information the form asks for. Be

sure to sign it, and mail it by first-class mail, or submit it online at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com), postmarked (if mailed) or received (if submitted online) no later than December 26, 2019 to:

*Liquid Aluminum Sulfate Antitrust Litigation – C&S Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103

You may be asked to verify the accuracy of the information provided in your Claim Form. Your claim must be valid to receive money. **If you submitted a Claim Form in connection with the settlement with a prior settlement with the Direct Purchaser Settlement Class, you need not submit an additional Claim Form in connection with the C&S Settlement.**

If the Court approves the Settlement (*see* “The Court’s Fairness Hearing” below), payments from the Settlement Funds will be distributed at a later date to members of the Direct Purchaser Settlement Class who submit valid Claim Forms.

There are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.

#### 10. HOW MUCH WILL MY PAYMENT BE?

Direct Purchaser Settlement Class Members who file valid claims will receive their *pro rata* share of the Net Settlement Fund based on: (1) the Direct Purchaser Settlement Class Member’s eligible purchases of Alum; (2) the total money available to pay all claims; (3) the total dollar value of all valid claims submitted; and (4) the cost of settlement administration and notice and the Court-awarded attorneys’ fees, expenses and Case Contribution Awards (*see* Question 16 below). In other words, the Net Settlement Fund shall be allocated on a *pro rata* basis based on the total dollar value of each Direct Purchaser Settlement Class Member’s eligible purchase(s) of Alum in proportion to the total dollar value of all valid claims submitted.

Interim DPP Lead Counsel’s proposed plan for distributing the Net Settlement Fund to Direct Purchaser Settlement Class (“Plan of Distribution”) will be presented to the Court with its papers in support of final approval of the Settlement. Details about the proposed Plan of Distribution will be available at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com) starting no later than October 17, 2019.

**Important!** Direct Purchaser Settlement Class Members who exclude themselves in accordance with Question 13 below will not be able to share in the distribution from the Net Settlement Fund.

#### 11. WHEN WILL I RECEIVE A PAYMENT?

There is no date certain for making payments from the Settlement Funds. The Net Settlement Fund will be distributed to eligible Direct Purchaser Settlement Class Members after the Court grants final approval to the Settlement, all claims have been fully processed by the Settlement Administrator and the Court has authorized distribution of the Net Settlement Fund. Updates on this process will be made available at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com).

**Please Note:** The Settlement may be terminated on several grounds, including if the Court does not approve or materially modifies the Settlement. Should the Settlement be terminated, the Settlement Funds less the cost of settlement administration and notice will be returned to C&S and this Action will proceed against C&S as if the Settlement had not been reached. If the Settlement is terminated, there will be no payments made to Direct Purchaser Settlement Class Members.

#### 12. WHAT AM I GIVING UP TO RECEIVE A PAYMENT?

Unless you exclude yourself, you will remain in the Direct Purchaser Settlement Class, and that means that you cannot sue, continue to sue, or be part of any other lawsuit against C&S about the legal issues in this case. It also means that all of the Court’s orders will apply to you and legally bind you. As set forth in paragraphs 14 of the Settlement Agreement:

- **Release:** Upon Final Judgment and in consideration of payment of the Settlement Funds into the Direct Purchaser Escrow Account, and for other valuable consideration, the C&S Released Parties<sup>4</sup> shall be completely released, acquitted, and forever discharged from any and all claims, demands, actions, suits, causes of action, whether class, individual, or otherwise in nature (whether or not any Direct Purchaser Settlement Class Member has objected to the Settlement or

<sup>4</sup> “C&S Released Parties” means C&S, its predecessors or assigns, and their current and former, direct and indirect parents, subsidiaries, affiliates, and all of their directors, officers, managers, members, agents, representatives and employees.

- makes a claim upon or participates in the Settlement Funds, whether directly, representatively, derivatively or in any other capacity) that the Releasing Parties ever had, now has, or hereafter can, shall, or may ever have, that exist as of the date of Final Judgment, on account of, or in any way arising out of, any and all known and unknown, foreseen and unforeseen, suspected or unsuspected, actual or contingent, liquidated or unliquidated claims, injuries, damages, and the consequences thereof in any way arising out of or relating in any way to the facts and circumstances alleged in the Consolidated Proceedings ("Released Claims"), provided, however, that nothing herein shall release claims involving any negligence, personal injury, breach of product warranty, bailment, failure to deliver lost goods, damaged or delayed goods, product defect, or similar claims relating to Alum. During the period after the expiration of the deadline for submitting an opt-out notice, as determined by the Court, and prior to Final Judgment, all Releasing Parties shall be preliminarily enjoined and barred from asserting any Released Claims against the C&S Released Parties. C&S further agrees that it will not file any suit against the Releasing Parties and their current and former, direct and indirect, parents, subsidiaries, affiliates, directors, officers, shareholders, and employees arising out of or relating to the Released Claims. The release of the Released Claims will become effective as to all Releasing Parties upon Final Judgment. Upon Final Judgment, the Releasing Parties further agree that they will not file any other suit against the C&S Released Parties arising out of or relating to the Released Claims.
- **Further Release:** In addition to the provisions of Paragraphs 14, the Releasing Parties expressly waive and release, solely with respect to the Released Claims, upon Final Judgment, any and all provisions, rights, and benefits conferred by Section 1542 of the California Civil Code, which states:

CERTAIN CLAIMS NOT AFFECTED BY GENERAL RELEASE. A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS WHICH THE CREDITOR DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE, WHICH IF KNOWN BY HIM OR HER MUST HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR;

- or by any law of any state or territory of the United States, or principle of common law, which is similar, comparable, or equivalent to Section 1542 of the California Civil Code. Each Releasing Party may hereafter discover facts other than or different from those which he, she, or it knows or believes to be true with respect to the claims which are released pursuant to the provisions of Paragraphs 15 and 16, but each Releasing Party hereby expressly waives and fully, finally, and forever settles and releases, upon Final Judgment, any known or unknown, suspected or unsuspected, contingent or non-contingent claim that the Releasing Parties have agreed to release pursuant to Paragraphs 14, whether or not concealed or hidden, without regard to the subsequent discovery or existence of such different or additional facts.
- **Reservation of Claims.** The Parties intend by this Agreement to release only the C&S Released Parties with respect to the Released Claims. The Parties specifically do not intend this Agreement, or any part hereof or any other aspect of the proposed Settlement, to compromise or otherwise affect in any way any rights the Releasing Parties have or may have against any other person, firm, association, or corporation whatsoever, including, but not limited to the Non-Settling Defendants. The release set forth in Paragraphs 14 and 15 above is not intended to and shall not release any claims other than the Released Claims. The sales of Alum by C&S in the United States from January 1, 1997 through at least February 28, 2011 shall remain in the cases against the Non-Settling Defendants in the Consolidated Proceedings as a basis for damage claims and shall be part of any joint and several liability claims against Non-Settling Defendants in the Consolidated Proceedings or other persons or entities other than the C&S Released Parties.

### **EXCLUDING YOURSELF FROM THE DIRECT PURCHASER SETTLEMENT CLASS**

If you want to keep the right to sue or continue to sue C&S on your own about the legal issues being resolved by the Settlement, then you must take steps to get out of the Direct Purchaser Settlement Class. This is called excluding yourself - or sometimes referred to as "opting out." If you opt out of the Direct Purchaser Settlement Class, you will not receive any payment from the Net Settlement Fund.

#### **13. HOW DO I GET OUT OF THE DIRECT PURCHASER SETTLEMENT CLASS?**

To exclude yourself, you must send a letter saying that you want to be excluded from the Direct Purchaser Settlement Class. The letter must include the following information: (i) a statement indicating that you want to be excluded from the Direct Purchaser Settlement Class in *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD); (ii) your name, address, telephone number, and your signature; (iii) all trade names or business names and

all addresses (including any addresses that have received shipments of Alum from a Defendant) you or your business have used, as well as any subsidiaries or affiliates who are requesting to be excluded from the Direct Purchaser Settlement Class, and (iv) the total purchases of Alum in dollars by you during the Class Period. Your letter must be **postmarked by October 24, 2019** and sent to:

Class Action Opt Out C&S  
Attn: Liquid Aluminum Sulfate Antitrust Litigation – Direct Purchaser Settlements  
P.O. Box 30097  
Philadelphia, PA 19103

**If you ask to be excluded from the Direct Purchaser Settlement Class you will not get any payment from the Net Settlement Fund created by the Settlement and you cannot object to the Settlement. If you want to receive a payment from the Settlement, do not exclude yourself.**

**Important - Please Note:** Unless you exclude yourself, if the Court approves the Settlement, you give up any right to sue C&S for the claims that the Settlement resolves. If you have a pending lawsuit against C&S involving the same legal issues in this case, speak to your lawyer in that case immediately. You must exclude yourself from the Direct Purchaser Settlement Class in order to continue your own lawsuit against C&S.

**Warning!** If your letter is sent after the deadline, your request for exclusion will be considered invalid and you will not be excluded from the Direct Purchaser Settlement Class. You cannot exclude yourself by telephone or email.

**14. IF I EXCLUDE MYSELF, CAN I RECEIVE MONEY FROM THE SETTLEMENT?**

No. If you decide to exclude yourself from the Direct Purchaser Settlement Class, you will not be able to receive money from the Settlement.

**THE LAWYERS REPRESENTING YOU**

**15. DO I HAVE A LAWYER IN THIS CASE?**

Yes. The Court appointed James E. Cecchi, Esq. of Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. as Interim DPP Lead Counsel to represent the Direct Purchaser Settlement Class on an interim basis and for purposes of the Settlement.

If you want to be represented by your own lawyer and have that lawyer appear in court for you concerning the Settlement, you may hire one at your own expense. If you hire your own lawyer, you must tell the Court and send a copy of your notice to Interim DPP Lead Counsel at the address set forth in Question 17 below.

**16. HOW WILL THE LAWYERS BE PAID?**

You are not personally responsible for payment of attorneys' fees or expenses. Interim DPP Lead Counsel will seek an award of attorneys' fees up to 33.3% of the total consideration made available to the Direct Purchaser Settlement Class to compensate all of the lawyers and their law firms that have worked on this Action since its inception. Interim DPP Lead Counsel will also seek reimbursement of the costs and expenses advanced on behalf of the Direct Purchaser Settlement Class. If the Court approves Interim DPP Lead Counsel's requests, these amounts will be deducted from the Settlement Funds.

Interim DPP Lead Counsel will also seek Case Contribution Awards of no more than \$20,000 for each of the Direct Purchaser Class Plaintiffs who served as proposed class representatives while the case was pending. If awarded, these amounts will also be deducted from the Settlement Funds.

**Important!** Interim DPP Lead Counsel's request for attorneys' fees, expenses and Case Contribution Awards will be on file with the Court, and available for review at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com) as of October 17, 2019, 2019.

**OBJECTING TO THE SETTLEMENT, THE PLAN OF DISTRIBUTION AND/OR THE REQUEST FOR ATTORNEYS' FEES, EXPENSES AND CASE CONTRIBUTION AWARDS**

**17. HOW DO I TELL THE COURT THAT I DON'T LIKE THE SETTLEMENT, PLAN OF DISTRIBUTION AND/OR THE REQUEST FOR ATTORNEYS' FEES, EXPENSES AND CASE CONTRIBUTION AWARDS?**

If you are a Direct Purchaser Settlement Class Member (and have not excluded yourself), you may tell the Court that you object to (or disagree with) all or part of the Settlement, Plan of Distribution, and/or Interim DPP Lead Counsel's request for an award of attorneys' fees, reimbursement of expenses, and/or Case Contribution Awards to Direct Purchaser Class Plaintiffs. You must give reasons for your objection(s). The Court will consider your objections when it decides whether or not to finally approve the Settlement.

Your written objection must include the following: (i) a statement indicating that you object to the Settlement, the Plan of Distribution and/or the request for attorneys' fees, expenses, or Case Contribution Awards, in *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD); (ii) your name, address, telephone number, and your signature; (iii) the reasons you object and all documents and writings that you want the Court to consider; and (iv) proof of your membership in the Direct Purchaser Settlement Class, such as invoices showing that you satisfy the definition in Question 6. If you intend to appear at the final fairness hearing, you must also include a notice of intention to appear (see Question 21).

To object, you must file your written objection(s) with the Court at the following address by **October 24, 2019**:

Clerk of Court  
Martin Luther King, Jr. Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

You must also send a copy of your written objection(s) to Interim DPP Lead Counsel and Counsel for C&S at the following addresses by **October 24, 2019**:

Interim DPP Lead Counsel	Counsel for C&S
James E. Cecchi, Esq. Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. 5 Becker Farm Road Roseland, NJ 07068	John D. "Randy" Dalbey Chillivis, Cochran, Larkins & Bever LLP 3127 Maple Drive, NE Atlanta, Georgia 30305

**18. WHAT IS THE DIFFERENCE BETWEEN OBJECTING AND EXCLUDING?**

Objecting is simply telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you stay in the Direct Purchaser Settlement Class. Excluding yourself, or "opting out," means that you are removing yourself from the Direct Purchaser Settlement Class and will have no right to proceeds from the Settlement. If you exclude yourself, you also have no right to object to the Settlement, because the Settlement no longer affect you.

**THE COURT'S FAIRNESS HEARING**

**19. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?**

The Court will hold a Fairness Hearing at **2:00 p.m. on November 14, 2019**, at the United States District Court for the District of New Jersey, Martin Luther King, Jr. Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101. At the Fairness Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and whether to approve the Plan of Distribution and the request for attorneys' fees, expenses, and Case Contribution Awards. The Court will listen to Direct Purchaser Settlement Class Members who have asked to speak at the hearing. If there are objections or comments, the Court will consider them at that time. After the hearing, the Court will decide whether to approve the Settlement, the Plan of Distribution, and the request for attorneys' fees, expenses, and Case Contribution Awards. We do not know how long a decision will take to be made.

**Important!** The time and date of the Fairness Hearing may change without additional mailed or publication notice. For updated information on the Fairness Hearing, visit [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com).

**20. DO I HAVE TO COME TO THE HEARING?**

No. Interim DPP Lead Counsel will be prepared to answer any questions the Court may have at the Fairness Hearing. However, you are welcome to attend the hearing at your own expense. If you send an objection, you do not have to come to court to explain. As long as you mailed your written objection on time as set out in this Notice, the Court will consider it. You may also pay another lawyer to attend the hearing, but it is not required.

**21. MAY I SPEAK AT THE HEARING?**

You may ask the Court for permission to speak at the Fairness Hearing. If you wish to do so, you must file a Notice of Intention to Appear with the Court at the following address by **October 24, 2019**:

Clerk of Court  
Martin Luther King, Jr. Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

You must also mail copies of the Notice of Intention to Appear to the attorneys listed in Question 17 above, no later than **October 24, 2019**.

Your Notice of Intention to Appear must include (i) the case caption, *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD); (ii) your name, address, and telephone number, and (iii) personal information for other people (including lawyers) who want to speak at the hearing.

**IF YOU DO NOTHING**

**22. WHAT HAPPENS IF I DO NOTHING AT ALL?**

If you do nothing, you will remain in the Direct Purchaser Settlement Class, and you will be bound by the terms of the Settlement and will forego any right to sue, or be part of any other lawsuit against C&S over the "Released Claims."

If you remain in the Direct Purchaser Settlement Class, to qualify for a payment from the Settlement you must submit a Claim Form, a copy of which is enclosed with this Notice. See Question 9 above.

**GETTING MORE INFORMATION**

**23. WHERE CAN I GET MORE INFORMATION?**

This Notice summarizes the Settlement. More details are in the Settlement Agreement. You can review the Settlement Agreement and other documents related to the Action by visiting [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). In addition, Interim DPP Lead Counsel's motions for final approval of the Settlement, Plan of Distribution and request for attorneys' fees, expenses, and Case Contribution Awards are currently due to be filed with the Court by October 17, 2019 and will be available for review on the website.

If you have questions or want more information, you may contact the Settlement Administrator at *Liquid Aluminum Sulfate Antitrust Litigation – C&S Direct Purchaser Settlements*, c/o Settlement Administrator, P.O. Box 30097, Philadelphia, PA 19103; 1-855-338-6128. You can also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

**PLEASE DO NOT WRITE OR CALL THE COURT  
OR THE CLERK'S OFFICE FOR INFORMATION.**

DATED: SEPTEMBER 11, 2019

BY ORDER OF THE COURT  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

**Your claim must be  
postmarked by:  
December 26, 2019**

*Liquid Aluminum Sulfate Antitrust Litigation –  
C&S Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
[www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com)

**CAS**

**CLAIM FORM FOR SETTLEMENT WITH C&S CHEMICALS**

**IMPORTANT: PLEASE READ BEFORE COMPLETING THIS CLAIM FORM**

To be eligible for a payment from this Settlement, you must be a Direct Purchaser Settlement Class Member, *i.e.*, you must have purchased liquid aluminum sulfate (“Alum”) in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.

This Claim Form must be completed and returned by Direct Purchaser Settlement Class Members who seek to receive a payment from partial settlements (“Settlements”) in the action captioned *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD) (“Action”).

THIS CLAIM FORM MUST BE COMPLETED AND MAILED BY PREPAID, FIRST-CLASS MAIL TO THE ABOVE ADDRESS, OR SUBMITTED ONLINE AT [WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM](http://WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM), **POSTMARKED OR RECEIVED NO LATER THAN DECEMBER 26, 2019** IN ORDER TO BE ELIGIBLE TO RECEIVE A SHARE OF THE NET SETTLEMENT FUND IN CONNECTION WITH THE SETTLEMENTS. **IF YOU PREVIOUSLY SUBMITTED A CLAIM FORM WITH RESPECT TO ANOTHER DIRECT PURCHASER CLASS SETTLEMENT, IT IS NOT NECESSARY TO FILE AN ADDITIONAL CLAIM FORM TO PARTICIPATE IN THE SETTLEMENT WITH C&S.**

FAILURE TO SUBMIT YOUR CLAIM FORM BY THE DATE SPECIFIED ABOVE WILL SUBJECT YOUR CLAIM TO REJECTION AND MAY PRECLUDE YOU FROM BEING ELIGIBLE TO RECEIVE ANY MONEY IN CONNECTION WITH THE SETTLEMENT.

**DO NOT MAIL OR DELIVER YOUR CLAIM FORM TO THE COURT, THE PARTIES, OR THEIR COUNSEL. SUBMIT YOUR CLAIM FORM ONLY TO THE SETTLEMENT ADMINISTRATOR AT THE ADDRESS SET FORTH ABOVE.**

If you have questions regarding your Claim Form, please call 1-855-338-6128 or email [info@CandSLiquidaluminumdirectsettlement.com](mailto:info@CandSLiquidaluminumdirectsettlement.com). Members of the Direct Purchaser Settlement Class who do not timely and validly seek exclusion from the Direct Purchaser Settlement Class in accordance with the instructions set forth in the Notice will be bound by the judgment entered approving these Settlement as to C&S regardless of whether they submit a Claim Form.

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*\*Pages 3, 4 and 5 of this Claim Form must be completed and returned to the Settlement Administrator*

## PART I – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice that accompanies this Claim Form. The Notice describes the proposed Settlement with C&S, how Direct Purchaser Settlement Class Members are affected by the Settlement, and the manner in which the Net Settlement Fund will be distributed if the Settlement is approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.
2. **To be eligible for a payment from the Settlement, you must be a Direct Purchaser Settlement Class Member. The Direct Purchaser Settlement Class is defined as all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.<sup>1</sup>** Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.
3. **Important - Please Note:** This Claim Form does not pertain to the settlement involving the indirect purchasers. **DO NOT SUBMIT THIS CLAIM FORM IF YOU ARE AN INDIRECT PURCHASER.**
4. By submitting this Claim Form, you will be making a request to share in the proceeds of the Settlement described in the Notice. **IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER (see definition of Direct Purchaser Settlement Class on page 5 of the Notice), OR IF YOU SUBMITTED A REQUEST FOR EXCLUSION FROM THE DIRECT PURCHASER SETTLEMENT CLASS, DO NOT SUBMIT A CLAIM FORM. YOU MAY NOT PARTICIPATE IN THE SETTLEMENT IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER. THUS, IF YOU ARE EXCLUDED FROM THE DIRECT PURCHASER SETTLEMENT CLASS, ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.**
5. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.
6. Please be aware that there are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.
7. If the Court approves the Settlement, payments to eligible Direct Purchaser Settlement Class Members will be made after the Court grants final approval to the Settlement, after all appeals are resolved, and after the completion of all claims processing. This process could take substantial time. Please be patient.
8. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator, at the above address or by toll-free phone at 1-855-338-6128, or you may download the documents from the website [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). You may also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

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<sup>1</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Incorporated, American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, and Kenneth A. Ghazey.

**Your claim must be  
postmarked by:**

**JUNE 13, 2019**

*Liquid Aluminum Sulfate Antitrust Litigation –  
Chemtrade Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128

[www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com)  
[info@liquidaluminumchemtradesettlement.com](mailto:info@liquidaluminumchemtradesettlement.com)

**CHM**

**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Settlement Administrator in writing at the address above.

Claimant Names(s) (as the name(s) should appear on check, if eligible for payment):

Company

**CITY OF LEROY**

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

**VICKI MORELAND, CITY CLERK**

Mailing Address – Line 1: Street Address/P.O. Box:

**207 S. EAST STREET**

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

**LEROY**

State/Province:

**ILLINOIS**

Zip Code:

**61752-1895**

Country:

**U.S.A.**

Daytime Telephone Number:

**309-962-3031**

Evening Telephone Number:

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

**vmoreland@leroy.org**

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

## PART I – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice that accompanies this Claim Form. The Notice describes the proposed Settlements with Kemira and with Chemtrade, how Direct Purchaser Settlement Class Members are affected by the Settlements, and the manner in which the Net Settlement Fund will be distributed if the Settlements are approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.
2. **To be eligible for a payment from the Settlements, you must be a Direct Purchaser Settlement Class Member. The Direct Purchaser Settlement Class is defined as all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.<sup>1</sup>** Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.
3. **Important - Please Note:** This Claim Form does not pertain to the settlements involving the indirect purchasers. Information about the indirect purchaser settlements with Kemira and Chemtrade can be found by visiting the website [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). **DO NOT SUBMIT THIS CLAIM FORM IF YOU ARE AN INDIRECT PURCHASER.**
4. By submitting this Claim Form, you will be making a request to share in the proceeds of the Settlements described in the Notice. **IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER (see definition of Direct Purchaser Settlement Class on page 5 of the Notice), OR IF YOU SUBMITTED A REQUEST FOR EXCLUSION FROM THE DIRECT PURCHASER SETTLEMENT CLASS, DO NOT SUBMIT A CLAIM FORM. YOU MAY NOT PARTICIPATE IN THE SETTLEMENTS IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER. THUS, IF YOU ARE EXCLUDED FROM THE DIRECT PURCHASER SETTLEMENT CLASS, ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.**
5. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.
6. Please be aware that there are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.
7. If the Court approves the Settlements, payments to eligible Direct Purchaser Settlement Class Members will be made after the Court grants final approval to the Settlements, after all appeals are resolved, and after the completion of all claims processing. This process could take substantial time. Please be patient.
8. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator, at the above address or by toll-free phone at 1-855-338-6128, or you may download the documents from the website [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). You may also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

<sup>1</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, and Milton Sundbeck.

### PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased Directly from a Defendant	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: XX TONS	\$12,345	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, and Milton Sundbeck.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

#### PART IV – SUBMISSION TO JURISDICTION OF THE DISTRICT COURT

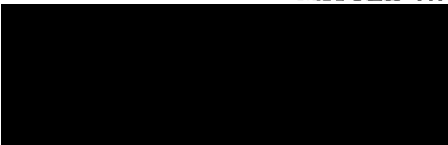
By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

#### PART V – CERTIFICATION

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HEREWITH ARE TRUE AND CORRECT COPIES OF WHAT THEY

P 

4/8/19  
Date

Print your name here

CITY OF LEROY  
Company Name

CITY CLERK  
Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

Gen Chemical

### PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased <u>Directly</u> from a Defendant*	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,346	<input type="checkbox"/>
10/09/2006	11.73 T	\$ 2,428.00	<input checked="" type="checkbox"/>
12/13/2006	11.44 T	\$ 2368.00	<input checked="" type="checkbox"/>
01/05/2007	11.54 T	\$ 2850.00	<input checked="" type="checkbox"/>
02/22/2007	10.64 T	\$ 2628.00	<input checked="" type="checkbox"/>
03/30/2007	11.55 T	\$ 2853.00	<input checked="" type="checkbox"/>
05/11/2007	11.78 T	\$ 2911.00	<input checked="" type="checkbox"/>
06/29/2007	11.57 T	\$ 2859.00	<input checked="" type="checkbox"/>
08/21/2007	11.61 T	\$ 2868.00	<input checked="" type="checkbox"/>
10/16/2007	11.70 T	\$ 3217.00	<input checked="" type="checkbox"/>
12/17/2007	11.75 T	\$ 3231.00	<input checked="" type="checkbox"/>
04/16/2008	11.81 T	\$ 4135.00	<input checked="" type="checkbox"/>
07/25/2008	11.28 T	\$ 4567.00	<input checked="" type="checkbox"/>

\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics, Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

### PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased <u>Directly</u> from a Defendant*	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,346	<input type="checkbox"/>
10-26-2009	11.34 T	\$ 4933.00	<input checked="" type="checkbox"/>
12-28-2009	11.17 T	\$ 4859.00	<input checked="" type="checkbox"/>
02-23-2010	12.25 T	\$ 5327.00	<input checked="" type="checkbox"/>
04-14-2010	12.20 T	\$ 5302.00	<input checked="" type="checkbox"/>
06-03-2010	11.56 T	\$ 5029.00	<input checked="" type="checkbox"/>
07-16-2010	11.35 T	\$ 4935.00	<input checked="" type="checkbox"/>
10-06-2010	11.82 T	\$ 5141.00	<input checked="" type="checkbox"/>
12-22-2010	11.54 T	\$ 5021.00	<input checked="" type="checkbox"/>
02-11-2011	11.67 T	\$ 5449.00	<input checked="" type="checkbox"/>
		\$	<input checked="" type="checkbox"/>
		\$	<input checked="" type="checkbox"/>
		\$	<input checked="" type="checkbox"/>

\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

### PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES

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MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,346	<input type="checkbox"/>
01/25/2008	11.64 T	\$ 3,200.00	<input checked="" type="checkbox"/>
03/26/2008	11.69 T	\$ 3,216.00	<input checked="" type="checkbox"/>
06/12/2008	11.67 T	\$ 4,086.00	<input checked="" type="checkbox"/>
08/21/2008	11.54 T	\$ 4,673.00	<input checked="" type="checkbox"/>
10/17/2008	12.13 T	\$ 4,911.00	<input checked="" type="checkbox"/>
12/08/2008	11.09 T	\$ 4,491.00	<input checked="" type="checkbox"/>
01/16/2009	11.76 T	\$ 4,764.00	<input checked="" type="checkbox"/>
03/21/2009	10.93 T	\$ 4,754.00	<input checked="" type="checkbox"/>
04/13/2009	12.03 T	\$ 5,231.00	<input checked="" type="checkbox"/>
05/26/2009	11.92 T	\$ 5,185.00	<input checked="" type="checkbox"/>
06/30/2009	12.18 T	\$ 5,299.00	<input checked="" type="checkbox"/>
08/18/2009	12.47 T	\$ 5,423.00	<input checked="" type="checkbox"/>

\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

Your claim must be  
postmarked by:

JUNE 13, 2019

Liquid Aluminum Sulfate Antitrust Litigation –  
Chemtrade Direct Purchaser Settlements  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
[www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com)  
[info@liquidaluminumchemtradesettlement.com](mailto:info@liquidaluminumchemtradesettlement.com)

CHM

## PART II – CLAIMANT INFORMATION

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you MUST notify the Settlement Administrator in writing at the address above.

Claimant Names(s) (as the name(s) should appear on check, if eligible for payment):

Company

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Mailing Address – Line 1: Street Address/P.O. Box:

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

State/Province:

Zip Code:

Country:

Daytime Telephone Number:

Evening Telephone Number:

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

## PART I – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice that accompanies this Claim Form. The Notice describes the proposed Settlements with Kemira and with Chemtrade, how Direct Purchaser Settlement Class Members are affected by the Settlements, and the manner in which the Net Settlement Fund will be distributed if the Settlements are approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.

2. **To be eligible for a payment from the Settlements, you must be a Direct Purchaser Settlement Class Member. The Direct Purchaser Settlement Class is defined as all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.<sup>1</sup>** Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.

3. **Important - Please Note:** This Claim Form does not pertain to the settlements involving the indirect purchasers. Information about the indirect purchaser settlements with Kemira and Chemtrade can be found by visiting the website [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). **DO NOT SUBMIT THIS CLAIM FORM IF YOU ARE AN INDIRECT PURCHASER.**

4. By submitting this Claim Form, you will be making a request to share in the proceeds of the Settlements described in the Notice. **IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER (see definition of Direct Purchaser Settlement Class on page 5 of the Notice), OR IF YOU SUBMITTED A REQUEST FOR EXCLUSION FROM THE DIRECT PURCHASER SETTLEMENT CLASS, DO NOT SUBMIT A CLAIM FORM. YOU MAY NOT PARTICIPATE IN THE SETTLEMENTS IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER. THUS, IF YOU ARE EXCLUDED FROM THE DIRECT PURCHASER SETTLEMENT CLASS, ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.**

5. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.

6. Please be aware that there are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.

7. If the Court approves the Settlements, payments to eligible Direct Purchaser Settlement Class Members will be made after the Court grants final approval to the Settlements, after all appeals are resolved, and after the completion of all claims processing. This process could take substantial time. Please be patient.

8. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator, at the above address or by toll-free phone at 1-855-338-6128, or you may download the documents from the website [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). You may also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

<sup>1</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, and Milton Sundbeck.

### PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES

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Date of Purchase	Quantity of Alum Purchased Directly from a Defendant	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: XX TONS	\$12,345	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, and Milton Sundbeck.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART IV – SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

By signing below, you are verifying that:

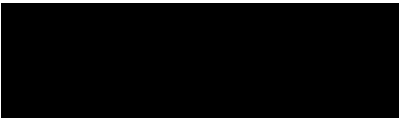
1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V – CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HERewith ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPO

Signature



5/30/2019  
Date

Sarah Stephen  
Print your name here

City of Altamont  
Company Name

City Clerk  
Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**Your claim must be  
postmarked by:**

**JUNE 13, 2019**

*Liquid Aluminum Sulfate Antitrust Litigation –  
Chemtrade Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
[www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com)  
[info@liquidaluminumchemtradesettlement.com](mailto:info@liquidaluminumchemtradesettlement.com)

**CHM**

**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you MUST notify the Settlement Administrator in writing at the address above.

Claimant Names(s) (as the name(s) should appear on check, if eligible for payment):

**CITY of SALEM, IL**

Company

**CITY of SALEM, ILLINOIS**

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

**JOHN W. PRUDEN**

Mailing Address – Line 1: Street Address/P.O. Box:

**101 S. BROADWAY**

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

**SALEM**

State/Province:

**IL**

Zip Code:

**62881**

Country:

**UNITED STATES**

Daytime Telephone Number:

**618-548-2222**

Evening Telephone Number:

**618-548-2232**

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

**PUBLICWORKS@SALEMIL.US**

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

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MM/DD/YYYY	EXAMPLE: XX TONS	\$12,345	<input type="checkbox"/>
01/20/1997	3660 gal.	\$ 1780	<input checked="" type="checkbox"/>
02/28/1997		\$ 1693	<input checked="" type="checkbox"/>
04/21/1997		\$ 1763	<input checked="" type="checkbox"/>
06/01/1997		\$ 1838	<input checked="" type="checkbox"/>
08/11/1997		\$ 1554	<input checked="" type="checkbox"/>
09/08/1997		\$ 1602	<input checked="" type="checkbox"/>
10/06/1997		\$ 1573	<input checked="" type="checkbox"/>
11/12/1997		\$ 1616	<input checked="" type="checkbox"/>
12/02/1997		\$ 1606	<input checked="" type="checkbox"/>
01/19/1998		\$ 2425	<input checked="" type="checkbox"/>
02/09/1998		\$ 2298	<input checked="" type="checkbox"/>
03/12/1998		\$ 2217	<input checked="" type="checkbox"/>

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, and Milton Sundbeck.

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**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

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MM/DD/YYYY	EXAMPLE: XX TONS	\$12,345	<input type="checkbox"/>
04/30/1998		\$ 2272	<input checked="" type="checkbox"/>
06/01/1998	45,520 LBS.	\$ 3392	<input checked="" type="checkbox"/>
07/06/1998	45,840 LBS.	\$ 3415	<input checked="" type="checkbox"/>
07/31/1998		\$ 1680	<input checked="" type="checkbox"/>
09/10/1998		\$ 1674	<input checked="" type="checkbox"/>
10/28/1998		\$ 1652	<input checked="" type="checkbox"/>
12/15/1998		\$ 1671	<input checked="" type="checkbox"/>
02/02/1999		\$ 1619	<input checked="" type="checkbox"/>
03/08/1999		\$ 1661	<input checked="" type="checkbox"/>
04/21/1999		\$ 1656	<input checked="" type="checkbox"/>
06/04/1999		\$ 1739	<input checked="" type="checkbox"/>
07/07/1999		\$ 1797	<input checked="" type="checkbox"/>

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MM/DD/YYYY	EXAMPLE: XX TONS	\$12,345	<input type="checkbox"/>
08/05/1999		\$ 2066	<input checked="" type="checkbox"/>
09/07/1999		\$ 1742	<input checked="" type="checkbox"/>
11/05/1999		\$ 1705	<input checked="" type="checkbox"/>
12/08/1999		\$ 1710	<input checked="" type="checkbox"/>
05/03/2000		\$ 1854	<input checked="" type="checkbox"/>
06/12/2000		\$ 1894	<input checked="" type="checkbox"/>
07/18/2000		\$ 1791	<input checked="" type="checkbox"/>
08/28/2000		\$ 1876	<input checked="" type="checkbox"/>
11/09/2000		\$ 1804	<input checked="" type="checkbox"/>
02/12/2001		\$ 1856	<input type="checkbox"/>
04/23/2001		\$ 1788	<input checked="" type="checkbox"/>
06/12/2001		\$ 1867	<input checked="" type="checkbox"/>

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Date of Purchase	Quantity of Alum Purchased Directly from a Defendant	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: XX TONS	\$12,345	<input type="checkbox"/>
08/03/2001		\$ 1884	<input checked="" type="checkbox"/>
12/27/2001		\$ 1943	<input checked="" type="checkbox"/>
03/14/2002		\$ 1924	<input checked="" type="checkbox"/>
05/06/2002		\$ 1917	<input checked="" type="checkbox"/>
07/11/2002		\$ 1876	<input checked="" type="checkbox"/>
03/20/2003		\$ 1931	<input checked="" type="checkbox"/>
04/25/2003		\$ 1878	<input checked="" type="checkbox"/>
05/30/2003		\$ 1908	<input checked="" type="checkbox"/>
07/08/2003		\$ 1941	<input checked="" type="checkbox"/>
08/20/2003		\$ 1888	<input checked="" type="checkbox"/>
09/30/2003		\$ 1879	<input checked="" type="checkbox"/>
01/19/2004		\$ 1929	<input checked="" type="checkbox"/>

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, and Milton Sundbeck.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased Directly from a Defendant	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: XX TONS	\$12,345	<input type="checkbox"/>
04/02/2004		\$ 1902	<input checked="" type="checkbox"/>
06/08/2004		\$ 2114	<input checked="" type="checkbox"/>
07/26/2004		\$ 2130	<input checked="" type="checkbox"/>
09/09/2004		\$ 2059	<input checked="" type="checkbox"/>
11/07/2004		\$ 2130	<input checked="" type="checkbox"/>
01/07/2005		\$ 2067	<input checked="" type="checkbox"/>
03/02/2006		\$ 2130	<input checked="" type="checkbox"/>
05/18/2006		\$ 2203	<input checked="" type="checkbox"/>
07/18/2006		\$ 2181	<input checked="" type="checkbox"/>
09/25/2006		\$ 2158	<input checked="" type="checkbox"/>
11/21/2006		\$ 2098	<input checked="" type="checkbox"/>
01/12/2007		\$ 2173	<input checked="" type="checkbox"/>

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, and Milton Sundbeck.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased Directly from a Defendant	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,345	<input type="checkbox"/>
03/02/2007		\$ 2133	<input checked="" type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, and Milton Sundbeck.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART IV – SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V – CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HEREWITH ARE TRUE AND CORRECT COPIES OF WHAT THEY P



06-11-19

Date

S.

JOHN W. PRUDEN

Print your name here

CITY OF SALEM, IL

Company Name

PUBLIC WORKS DIRECTOR

Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**Your claim must be  
postmarked by:**

**JUNE 13, 2019**

*Liquid Aluminum Sulfate Antitrust Litigation –  
Chemtrade Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
[www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com)  
[info@liquidaluminumchemtradesettlement.com](mailto:info@liquidaluminumchemtradesettlement.com)

**CHM**

**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Settlement Administrator in writing at the address above.

Claimant Names(s) (as the name(s) should appear on check, if eligible for payment):

County of Stafford, Virginia

Company

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Jeanise G. Ewing

Mailing Address – Line 1: Street Address/P.O. Box:

P.O. Box 339

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

Stafford

State/Province:

VA

Zip Code:

22555

Country:

U.S.

Daytime Telephone Number:

540-658-8636

Evening Telephone Number:

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

jewing@staffordcountyva.gov

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

## PART I – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice that accompanies this Claim Form. The Notice describes the proposed Settlements with Kemira and with Chemtrade, how Direct Purchaser Settlement Class Members are affected by the Settlements, and the manner in which the Net Settlement Fund will be distributed if the Settlements are approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.
2. **To be eligible for a payment from the Settlements, you must be a Direct Purchaser Settlement Class Member. The Direct Purchaser Settlement Class is defined as all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.<sup>1</sup>** Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.
3. **Important - Please Note:** This Claim Form does not pertain to the settlements involving the indirect purchasers. Information about the indirect purchaser settlements with Kemira and Chemtrade can be found by visiting the website [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). **DO NOT SUBMIT THIS CLAIM FORM IF YOU ARE AN INDIRECT PURCHASER.**
4. By submitting this Claim Form, you will be making a request to share in the proceeds of the Settlements described in the Notice. **IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER (see definition of Direct Purchaser Settlement Class on page 5 of the Notice), OR IF YOU SUBMITTED A REQUEST FOR EXCLUSION FROM THE DIRECT PURCHASER SETTLEMENT CLASS, DO NOT SUBMIT A CLAIM FORM. YOU MAY NOT PARTICIPATE IN THE SETTLEMENTS IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER. THUS, IF YOU ARE EXCLUDED FROM THE DIRECT PURCHASER SETTLEMENT CLASS, ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.**
5. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.
6. Please be aware that there are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.
7. If the Court approves the Settlements, payments to eligible Direct Purchaser Settlement Class Members will be made after the Court grants final approval to the Settlements, after all appeals are resolved, and after the completion of all claims processing. This process could take substantial time. Please be patient.
8. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator, at the above address or by toll-free phone at 1-855-338-6128, or you may download the documents from the website [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). You may also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

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<sup>1</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, and Milton Sundbeck.

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased Directly from a Defendant	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: XX TONS	\$12,345	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__	★ See Attached	\$ _____	<input type="checkbox"/>
__/__/__	Documents	\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, and Milton Sundbeck.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART IV – SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

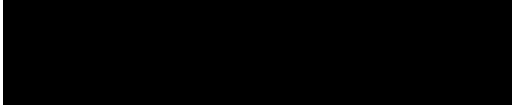
By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V – CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HERewith ARE TRUE AND CORRECT COPIES OF WHAT THEY



6/13/2019  
Date

Jeannise G. Ewing  
Print your name here

County of Stafford, Virginia  
Company Name

Assistant County Attorney  
Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**REMINDER CHECKLIST**

1. Please sign the above certification.
2. Remember to attach only **copies** of acceptable supporting documentation as these documents will not be returned to you.
3. Please do not highlight any portion of the Claim Form or any supporting documents.
4. Keep copies of the completed Claim Form and documentation for your own records.
5. The Settlement Administrator will acknowledge receipt of your Claim Form by mail, within 60 days. Your claim is not deemed filed until you receive an acknowledgement postcard. **IF YOU DO NOT RECEIVE AN ACKNOWLEDGEMENT POSTCARD WITHIN 60 DAYS, PLEASE CALL THE SETTLEMENT ADMINISTRATOR TOLL FREE AT 1-855-338-6128.**
6. If your address changes in the future, or if this Claim Form was sent to an old or incorrect address, please send the Settlement Administrator written notification of your new address.
7. If you have any questions or concerns regarding your claim, please contact the Settlement Administrator at the above address or toll-free at 1-855-338-6128 or visit [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com).

**THIS CLAIM FORM MUST BE MAILED BY PREPAID, FIRST-CLASS MAIL, OR SUBMITTED ONLINE AT [WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM](http://WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM), POSTMARKED OR RECEIVED NO LATER THAN JUNE 13, 2019.**

A Claim Form received by the Settlement Administrator shall be deemed to have been submitted when posted, if a postmark date on or before June 13, 2019 is indicated on the envelope and it is mailed First Class, and addressed in accordance with the above instructions. In all other cases, a Claim Form shall be deemed to have been submitted when actually received by the Settlement Administrator.

**It will take a significant amount of time to fully process all of the Claim Forms. Please be patient.**

**Your claim must be  
postmarked by:**

**JUNE 13, 2019**

*Liquid Aluminum Sulfate Antitrust Litigation --  
Chemtrade Direct Purchaser Settlements*

c/o Settlement Administrator

P.O. Box 30097

Philadelphia, PA 19103

1-855-338-6128

[www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com)

[info@liquidaluminumchemtradesettlement.com](mailto:info@liquidaluminumchemtradesettlement.com)

**CHM**

**CLAIM FORM FOR SETTLEMENTS WITH KEMIRA AND CHEMTRADE**

**IMPORTANT: PLEASE READ BEFORE COMPLETING THIS CLAIM FORM**

To be eligible for a payment from these Settlements, you must be a Direct Purchaser Settlement Class Member, *i.e.*, you must have purchased liquid aluminum sulfate ("Alum") in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.

This Claim Form must be completed and returned by Direct Purchaser Settlement Class Members who seek to receive a payment from partial settlements ("Settlements") that have been reached with Kemira Chemicals, Inc. ("Kemira") and with Chemtrade Logistics Income Fund; General Chemical Corporation; General Chemical LLC; General Chemical Performance Products, LLC; Chemtrade Chemicals Corporation; Chemtrade Chemicals US LLC; and Chemtrade Solutions, LLC (together, "Chemtrade") in the action captioned *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD) ("Action").

THIS CLAIM FORM MUST BE COMPLETED AND MAILED BY PREPAID, FIRST-CLASS MAIL TO THE ABOVE ADDRESS, OR SUBMITTED ONLINE AT [WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM](http://WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM), **POSTMARKED OR RECEIVED NO LATER THAN JUNE 13, 2019** IN ORDER TO BE ELIGIBLE TO RECEIVE A SHARE OF THE NET SETTLEMENT FUND IN CONNECTION WITH THE SETTLEMENTS. **IF YOU PREVIOUSLY SUBMITTED A CLAIM FORM WITH RESPECT TO THE SETTLEMENT WITH THE GEO PARTIES, IT IS NOT NECESSARY TO FILE AN ADDITIONAL CLAIM FORM TO PARTICIPATE IN THE SETTLEMENTS WITH KEMIRA AND CHEMTRADE.**

FAILURE TO SUBMIT YOUR CLAIM FORM BY THE DATE SPECIFIED ABOVE WILL SUBJECT YOUR CLAIM TO REJECTION AND MAY PRECLUDE YOU FROM BEING ELIGIBLE TO RECEIVE ANY MONEY IN CONNECTION WITH THE SETTLEMENTS.

**DO NOT MAIL OR DELIVER YOUR CLAIM FORM TO THE COURT, THE PARTIES, OR THEIR COUNSEL. SUBMIT YOUR CLAIM FORM ONLY TO THE SETTLEMENT ADMINISTRATOR AT THE ADDRESS SET FORTH ABOVE.**

If you have questions regarding your Claim Form, please call 1-855-338-6128 or email [info@liquidaluminumchemtradesettlement.com](mailto:info@liquidaluminumchemtradesettlement.com). Members of the Direct Purchaser Settlement Class who do not timely and validly seek exclusion from the Direct Purchaser Settlement Class in accordance with the instructions set forth in the Notice will be bound by the judgment entered approving these Settlements as to Kemira and Chemtrade regardless of whether they submit a Claim Form.

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<b>PART IV – SUBMISSION TO JURISDICTION OF THE DISTRICT COURT</b>	<b>5</b>
<b>PART V – CERTIFICATION</b>	<b>5</b>
<b>REMINDER CHECKLIST</b>	<b>6</b>

***\*Pages 3, 4 and 5 of this Claim Form must be completed and returned to the Settlement Administrator***

You must also mail copies of the Notice of Intention to Appear to the attorneys listed in Question 17 above, no later than **April 2, 2019**.

Your Notice of Intention to Appear must include (i) the case caption, *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD); (ii) your name, address, and telephone number, and (iii) personal information for other people (including lawyers) who want to speak at the hearing.

**IF YOU DO NOTHING**

**22. WHAT HAPPENS IF I DO NOTHING AT ALL?**

If you do nothing, you will remain in the Direct Purchaser Settlement Class, and you will be bound by the terms of the Settlements and will forego any right to sue, or be part of any other lawsuit against Kemira or Chemtrade over the “Released Claims.”

If you remain in the Direct Purchaser Settlement Class, to qualify for a payment from the Settlements you must submit a Claim Form, a copy of which is enclosed with this Notice. *See* Question 9 above.

**GETTING MORE INFORMATION**

This Notice summarizes the Settlements. More details are in the Settlement Agreements. You can review the Settlement Agreements and other documents related to the Action by visiting [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). In addition, Interim DPP Lead Counsel’s motions for final approval of the Settlements, Plan of Distribution and request for attorneys’ fees, expenses, and Case Contribution Awards are currently due to be filed with the Court by March 22, 2019 and will be available for review on the website.

If you have questions or want more information, you may contact the Settlement Administrator at *Liquid Aluminum Sulfate Antitrust Litigation – Chemtrade Direct Purchaser Settlements*, c/o Settlement Administrator, P.O. Box 30097, Philadelphia, PA 19103; 1-855-338-6128. You can also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

**PLEASE DO NOT WRITE OR CALL THE COURT  
OR THE CLERK’S OFFICE FOR INFORMATION.**

DATED: FEBRUARY 6, 2019

BY ORDER OF THE COURT  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

To object, you must file your written objection(s) with the Court at the following address by **APRIL 2, 2019**:

Clerk of Court  
Martin Luther King, Jr. Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

You must also send a copy of your written objection(s) to Interim DPP Lead Counsel and Counsel for Kemira and/or Chemtrade, as appropriate, at the following addresses by **APRIL 2, 2019**:

Interim DPP Lead Counsel	Counsel for Kemira	Counsel for Chemtrade
James E. Cecchi, Esq. Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. 5 Becker Farm Road Roseland, NJ 07068	Jeffrey S. Cashdan King & Spalding LLP 1180 Peachtree Street, NE Atlanta, GA 30309	Steven A. Reiss Well, Gotshal & Manges LLP 767 Fifth Avenue New York, NY 10153-0119

**18. WHAT IS THE DIFFERENCE BETWEEN OBJECTING AND EXCLUDING?**

Objecting is simply telling the Court that you do not like something about the Settlements. You can object to the Settlements only if you stay in the Direct Purchaser Settlement Class. Excluding yourself, or “opting out,” means that you are removing yourself from the Direct Purchaser Settlement Class and will have no right to proceeds from the Settlements. If you exclude yourself, you also have no right to object to the Settlements, because the Settlements no longer affect you.

**THE COURT’S FAIRNESS HEARING**

**19. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENTS?**

The Court will hold a Fairness Hearing at **1:30 p.m. on April 17, 2019 in Courtroom 5D**, at the United States District Court for the District of New Jersey, Martin Luther King, Jr. Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101. At the Fairness Hearing, the Court will consider whether the Settlements are fair, reasonable, and adequate and whether to approve the Plan of Distribution and the request for attorneys’ fees, expenses, and Case Contribution Awards. The Court will listen to Direct Purchaser Settlement Class Members who have asked to speak at the hearing. If there are objections or comments, the Court will consider them at that time. After the hearing, the Court will decide whether to approve the Settlements, the Plan of Distribution, and the request for attorneys’ fees, expenses, and Case Contribution Awards. We do not know how long a decision will take to be made.

**Important!** The time and date of the Fairness Hearing may change without additional mailed or publication notice. For updated information on the Fairness Hearing, visit [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com).

**20. DO I HAVE TO COME TO THE HEARING?**

No. Interim DPP Lead Counsel will be prepared to answer any questions the Court may have at the Fairness Hearing. However, you are welcome to attend the hearing at your own expense. If you send an objection, you do not have to come to court to explain. As long as you mailed your written objection on time as set out in this Notice, the Court will consider it. You may also pay another lawyer to attend the hearing, but it is not required.

**21. MAY I SPEAK AT THE HEARING?**

You may ask the Court for permission to speak at the Fairness Hearing. If you wish to do so, you must file a Notice of Intention to Appear with the Court at the following address by **April 2, 2019**:

Clerk of Court  
Martin Luther King, Jr. Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Important - Please Note:** Unless you exclude yourself, if the Court approves the Settlements, you give up any right to sue Kemira and Chemtrade for the claims that the Settlements resolve. If you have a pending lawsuit against Kemira and/or Chemtrade involving the same legal issues in this case, speak to your lawyer in that case immediately. You must exclude yourself from the Direct Purchaser Settlement Class in order to continue your own lawsuit against Kemira and/or Chemtrade.

**Warning!** If your letter is sent after the deadline, your request for exclusion will be considered invalid and you will not be excluded from the Direct Purchaser Settlement Class. You cannot exclude yourself by telephone or email.

**14. IF I EXCLUDE MYSELF, CAN I RECEIVE MONEY FROM THE SETTLEMENTS?**

No. If you decide to exclude yourself from the Direct Purchaser Settlement Class, you will not be able to receive money from the Settlements.

**THE LAWYERS REPRESENTING YOU**

**15. DO I HAVE A LAWYER IN THIS CASE?**

Yes. The Court appointed James E. Cecchi, Esq. of Carell, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. as Interim DPP Lead Counsel to represent the Direct Purchaser Settlement Class on an interim basis and for purposes of the Settlements.

If you want to be represented by your own lawyer and have that lawyer appear in court for you concerning the Settlements, you may hire one at your own expense. If you hire your own lawyer, you must tell the Court and send a copy of your notice to Interim DPP Lead Counsel at the address set forth in Question 17 below.

**16. HOW WILL THE LAWYERS BE PAID?**

You are not personally responsible for payment of attorneys' fees or expenses. Interim DPP Lead Counsel will seek an award of attorneys' fees up to 33.3% of the total consideration made available to the Direct Purchaser Settlement Class to compensate all of the lawyers and their law firms that have worked on this Action since its inception. Interim DPP Lead Counsel will also seek reimbursement of the costs and expenses advanced on behalf of the Direct Purchaser Settlement Class. If the Court approves Interim DPP Lead Counsel's requests, these amounts will be deducted from the Settlement Funds.

Interim DPP Lead Counsel will also seek Case Contribution Awards of no more than \$40,000 for each of the Direct Purchaser Class Plaintiffs who served as proposed class representatives while the case was pending. If awarded, these amounts will also be deducted from the Settlement Funds.

**Important!** Interim DPP Lead Counsel's request for attorneys' fees, expenses and Case Contribution Awards will be on file with the Court, and available for review at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com) as of March 22, 2019.

**OBJECTING TO THE SETTLEMENTS, THE PLAN OF DISTRIBUTION AND/OR THE REQUEST FOR ATTORNEYS' FEES, EXPENSES AND CASE CONTRIBUTION AWARDS**

**17. HOW DO I TELL THE COURT THAT I DON'T LIKE THE SETTLEMENTS, PLAN OF DISTRIBUTION AND/OR THE REQUEST FOR ATTORNEYS' FEES, EXPENSES AND CASE CONTRIBUTION AWARDS?**

If you are a Direct Purchaser Settlement Class Member (and have not excluded yourself), you may tell the Court that you object to (or disagree with) all or part of the Settlements, Plan of Distribution, and/or Interim DPP Lead Counsel's request for an award of attorneys' fees, reimbursement of expenses, and/or Case Contribution Awards to Direct Purchaser Class Plaintiffs. You must give reasons for your objection(s). The Court will consider your objections when it decides whether or not to finally approve the Settlements.

Your written objection must include the following: (i) a statement indicating that you object to the Settlements, the Plan of Distribution and/or the request for attorneys' fees, expenses, or Case Contribution Awards, in *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD); (ii) your name, address, telephone number, and your signature; (iii) the reasons you object and all documents and writings that you want the Court to consider; and (iv) proof of your membership in the Direct Purchaser Settlement Class, such as invoices showing that you satisfy the definition in Question 6. If you intend to appear at the final fairness hearing, you must also include a notice of intention to appear (see Question 21).

- **Further Release:** In addition to the provisions of Paragraphs 15 and 16, the Releasing Parties expressly waive and release, solely with respect to the Released Claims, upon Final Judgment, any and all provisions, rights, and benefits conferred by Section 1542 of the California Civil Code, which states:

CERTAIN CLAIMS NOT AFFECTED BY GENERAL RELEASE. A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS WHICH THE CREDITOR DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE, WHICH IF KNOWN BY HIM OR HER MUST HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR;

or by any law of any state or territory of the United States, or principle of common law, which is similar, comparable, or equivalent to Section 1542 of the California Civil Code. Each Releasing Party may hereafter discover facts other than or different from those which he, she, or it knows or believes to be true with respect to the claims which are released pursuant to the provisions of Paragraphs 15 and 16, but each Releasing Party hereby expressly waives and fully, finally, and forever settles and releases, upon Final Judgment, any known or unknown, suspected or unsuspected, contingent or non-contingent claim that the Releasing Parties have agreed to release pursuant to Paragraphs 15 and 16, whether or not concealed or hidden, without regard to the subsequent discovery or existence of such different or additional facts.

- **Reservation of Claims.** The Parties intend by the Settlement Agreements to release only the Kemira Released Parties and Chemtrade Released Parties, respectively, with regard to the Released Claims. The Parties specifically do not intend the Settlement Agreements, or any part thereof or any other aspect of the proposed Settlements, to compromise or otherwise affect in any way any rights the Releasing Parties have or may have against any other person, firm, association, or corporation whatsoever, including, but not limited to the Non-Settling Defendants. The release set forth in Paragraphs 15 and 16 of the Settlement Agreements is not intended to and shall not release any claims other than the Released Claims. The sales of Alum by Kemira and Chemtrade in the United States from January 1, 1997 through February 28, 2011 shall remain in the cases against the Non-Settling Defendants in the Consolidated Proceedings as a basis for damage claims and shall be part of any joint and several liability claims against Non-Settling Defendants in the Consolidated Proceedings or other persons or entities other than the Kemira Released Parties and/or Chemtrade Released Parties.

**EXCLUDING YOURSELF FROM THE DIRECT PURCHASER SETTLEMENT CLASS**

If you want to keep the right to sue or continue to sue Kemira and/or Chemtrade on your own about the legal issues being resolved by the Settlements, then you must take steps to get out of the Direct Purchaser Settlement Class. This is called excluding yourself - or sometimes referred to as "opting out." If you opt out of the Direct Purchaser Settlement Class, you will not receive any payment from the Net Settlement Fund.

**13. HOW DO I GET OUT OF THE DIRECT PURCHASER SETTLEMENT CLASS?**

To exclude yourself, you must send a letter saying that you want to be excluded from the Direct Purchaser Settlement Class. The letter must include the following information: (i) a statement indicating that you want to be excluded from the Direct Purchaser Settlement Class in *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD); (ii) your name, address, telephone number, and your signature; (iii) all trade names or business names and all addresses (including any addresses that have received shipments of Alum from a Defendant) you or your business have used, as well as any subsidiaries or affiliates who are requesting to be excluded from the Direct Purchaser Settlement Class, and (iv) the total purchases of Alum in dollars by you during the Class Period. Your letter must be **postmarked by APRIL 2, 2019** and sent to:

*Liquid Aluminum Sulfate Antitrust Litigation – Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103

**If you ask to be excluded from the Direct Purchaser Settlement Class you will not get any payment from the Net Settlement Fund created by the Settlements and you cannot object to the Settlements. If you want to receive a payment from the Settlements, do not exclude yourself.**

have been fully processed by the Settlement Administrator and the Court has authorized distribution of the Net Settlement Fund. Updates on this process will be made available at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com).

**Please Note:** The Settlements may be terminated on several grounds, including if the Court does not approve or materially modifies the Settlements. Should the Settlements be terminated, the Settlement Funds less the cost of settlement administration and notice will be returned to Kemira and Chemtrade and this Action will proceed against Kemira and Chemtrade as if the Settlements had not been reached. If the Settlements are terminated, there will be no payments made to Direct Purchaser Settlement Class Members.

## 12. WHAT AM I GIVING UP TO RECEIVE A PAYMENT?

Unless you exclude yourself, you will remain in the Direct Purchaser Settlement Class, and that means that you cannot sue, continue to sue, or be part of any other lawsuit against Kemira or Chemtrade about the legal issues in this case. It also means that all of the Court's orders will apply to you and legally bind you. As set forth in paragraphs 15 and 16 of the Settlement Agreements:

- **Release:** Upon Final Judgment and in consideration of payment of the Settlement Funds into the Direct Purchaser Escrow Account, and for other valuable consideration, the Kemira Released Parties<sup>4</sup> and the Chemtrade Released Parties<sup>5</sup> shall be completely released, acquitted, and forever discharged from any and all claims, demands, actions, suits, causes of action, whether class, individual, or otherwise in nature (whether or not any Direct Purchaser Settlement Class Member has objected to the Settlements or makes a claim upon or participates in the Settlement Funds, whether directly, representatively, derivatively or in any other capacity) that the Releasing Parties<sup>6</sup> ever had, now has, or hereafter can, shall, or may ever have, that exist as of the date of Final Judgment, on account of, or in any way arising out of, any and all known and unknown, foreseen and unforeseen, suspected or unsuspected, actual or contingent, liquidated or unliquidated claims, injuries, damages, and the consequences thereof in any way arising out of or relating in any way to the facts and circumstances alleged in the Consolidated Proceedings ("Released Claims"), provided however, that nothing herein shall release claims involving any negligence, personal injury, breach of contract, bailment, failure to deliver lost goods, damaged or delayed goods, product defect, securities or similar claim relating to Alum. During the period after the expiration of the deadline for submitting an opt-out notice, as determined by the Court, and prior to Final Judgment, all Releasing Parties shall be preliminarily enjoined and barred from asserting any Released Claims against the Kemira Released Parties or Chemtrade Released Parties. The Kemira Released Parties and Chemtrade Released Parties further agree that they will not file any suit against the Releasing Parties and their current and former, direct and indirect, parents, subsidiaries, affiliates, directors, officers, shareholders, and employees arising out of or relating to the Released Claims. The release of the Released Claims will become effective as to all Releasing Parties upon Final Judgment. Upon Final Judgment, the Releasing Parties further agree that they will not file any other suit against the Kemira Released Parties or the Chemtrade Released Parties arising out of or relating to the Released Claims.

<sup>4</sup> The "Kemira Released Parties" are Kemira, its heirs or executors, and its current and former, direct and indirect parents, subsidiaries, affiliates, insurers, directors, officers, shareholders, agents, and employees. As used in this Paragraph, "affiliates" means entities controlling, controlled by or under common ownership or control with, in whole or in part, Kemira.

<sup>5</sup> The "Chemtrade Released Parties" are "(i) the Chemtrade Defendants and their parents, subsidiaries and affiliates, and (ii) any of the respective current and former, direct or indirect, directors, officers, managers, attorneys, equity holders, agents, and employees of any of the entities in (i) (including, but not limited to, Matthew LeBaron, Scott Wolff, Alex Avraamides, Frank Reichl, Amita Gupta, and Vincent Opalewski), provided, however, that excluded from the Chemtrade Released Parties are any American Securities entities, including without limitation any American Securities entity currently named in the Consolidated Proceedings or any American Securities entity involved in any way in the underlying transaction or any other current parents, subsidiaries and/or affiliates of any American Securities entity."

<sup>6</sup> "Releasing Party" or "Releasing Parties" refers individually and collectively, to the Direct Purchaser Settlement Class and all Direct Purchaser Settlement Class Members, including the Direct Purchaser Class Plaintiffs and the Direct Action Direct Purchaser Settlement Class Members, each on behalf of themselves and their respective predecessors and successors; their current and former, direct and indirect parents, subsidiaries and affiliates; their present and former shareholders, partners, directors, officers, owners of any kind, principals, members, agents, employees, contractors, attorneys, insurers, heirs, executors, administrators, devisees, representatives; their assigns of all such persons or entities, as well as any person or entity acting on behalf of or through any of them in any capacity whatsoever, jointly and severally; and any of their past, present and future agents, officials acting in their official capacities, legal representatives, agencies, departments, commissions and divisions; and also means, to the full extent of the power of the signatories hereto to release past, present and future claims, the following: (1) any Releasing Party's subdivisions (political or otherwise, including, but not limited to, municipalities, counties, parishes, villages, unincorporated districts and hospital districts), public entities, public instrumentalities and public education institutions; and (2) persons or entities acting in a parens patriae, sovereign, quasi-sovereign, private attorney general, qui tam, taxpayer or any other capacity, whether or not any of them participate in the Settlements. As used in this Paragraph, "affiliates" means entities controlling, controlled by or under common ownership or control with, in whole or in part, any of the Releasing Parties.

## **THE BENEFITS OF THE SETTLEMENTS**

### **8. WHAT DO THE SETTLEMENTS PROVIDE?**

Kemira has agreed to pay \$3.8 million in cash. Chemtrade has agreed to pay \$51 million in cash, plus assign certain indemnity rights against the former owners of General Chemical Corp.

The Settlement Funds will be used to pay: (i) the costs of settlement administration and notice as approved by the Court; (ii) attorneys' fees and expenses, as approved by the Court; and (iii) Case Contribution Awards to Direct Purchaser Class Plaintiffs for litigating the Action on behalf of the Direct Purchaser Settlement Class as approved by the Court. The Settlement Funds after deduction of the foregoing payments is referred to as the "Net Settlement Fund."

### **9. HOW DO I RECEIVE A PAYMENT?**

If you are a Direct Purchaser Settlement Class Member and do not exclude yourself, you may be eligible to receive a payment from the Settlements. **To qualify for a payment from the Settlements, you must submit a Claim Form, which is enclosed with this Notice or available at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com).** Please read the instructions contained in the Claim Form carefully. You must fill out the Claim Form and include all the information the form asks for. Be sure to sign it, and mail it by first-class mail, or submit it online at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com), **postmarked (if mailed) or received (if submitted online) no later than JUNE 13, 2019 to:**

*Liquid Aluminum Sulfate Antitrust Litigation – Chemtrade Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103

You may be asked to verify the accuracy of the information provided in your Claim Form. Your claim must be valid to receive money. **If you submitted a Claim Form in connection with the settlement with the GEO Settling Parties, you need not submit an additional Claim Form in connection with the Kemira and Chemtrade Settlements.**

If the Court approves the Settlements (*see* "The Court's Fairness Hearing" below), payments from the Settlement Funds will be distributed at a later date to members of the Direct Purchaser Settlement Class who submit valid Claim Forms.

There are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.

### **10. HOW MUCH WILL MY PAYMENT BE?**

Direct Purchaser Settlement Class Members who file valid claims will receive their *pro rata* share of the Net Settlement Fund based on: (1) the Direct Purchaser Settlement Class Member's eligible purchases of Alum; (2) the total money available to pay all claims; (3) the total dollar value of all valid claims submitted; and (4) the cost of settlement administration and notice and the Court-awarded attorneys' fees, expenses and Case Contribution Awards (*see* Question 16 below). In other words, the Net Settlement Fund shall be allocated on a *pro rata* basis based on the total dollar value of each Direct Purchaser Settlement Class Member's eligible purchase(s) of Alum in proportion to the total dollar value of all valid claims submitted.

Interim DPP Lead Counsel's proposed plan for distributing the Net Settlement Fund to Direct Purchaser Settlement Class ("Plan of Distribution") will be presented to the Court with its papers in support of final approval of the Settlements. Details about the proposed Plan of Distribution will be available at [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com) starting no later than March 22, 2019.

**Important!** Direct Purchaser Settlement Class Members who exclude themselves in accordance with Question 13 below will not be able to share in the distribution from the Net Settlement Fund.

### **11. WHEN WILL I RECEIVE A PAYMENT?**

There is no date certain for making payments from the Settlement Funds. The Net Settlement Fund will be distributed to eligible Direct Purchaser Settlement Class Members after the Court grants final approval to the Settlements, all claims

**3. WHO ARE THE SETTLING DEFENDANTS?**

The settling defendants are Kemira Chemicals, Inc. ("Kemira") and Chemtrade Logistics Income Fund; General Chemical Corporation; General Chemical LLC; General Chemical Performance Products, LLC; Chemtrade Chemicals Corporation; Chemtrade Chemicals US LLC; and Chemtrade Solutions, LLC, plus individual defendants Matthew LeBaron, Scott Wolff, Alex Avraamides, Frank Reichl, Amita Gupta, and Vincent Opalewski (together, "Chemtrade").

**4. WHY IS THIS A CLASS ACTION?**

In a class action, one or more individuals or entities, called "class representatives," sue on behalf of others who have similar claims. The class representatives in this case are Central Arkansas Water; City of Charlotte, North Carolina; City and County of Denver, Colorado, acting by and through its board of Water Commissioners; Flambeau River Papers, LLC; City of Greensboro, North Carolina; Mobile Area Water and Sewer System; City of Rochester, Minnesota; City of Sacramento, California; SUEZ Water Environmental Services Inc.; SUEZ Water New Jersey Inc.; SUEZ Water Princeton Meadows Inc.; SUEZ Water New York Inc.; SUEZ Water Pennsylvania Inc.; and City of Texarkana, Arkansas and City of Texarkana, Texas, d/b/a Texarkana Water Utilities (collectively referred to herein as "Direct Purchaser Class Plaintiffs"). The Direct Purchaser Class Plaintiffs and the individuals or entities with similar claims are individually "class members," together comprising a class. One court resolves the issues for all class members, except for those who exclude themselves from the class.

**5. WHY ARE THERE SETTLEMENTS OF THIS ACTION WITH KEMIRA AND CHEMTRADE?**

Kemira and Chemtrade have denied all liability and wrongdoing in this case and have asserted various defenses to the Direct Purchaser Class Plaintiffs' claims. The Court did not decide in favor of the Direct Purchaser Class Plaintiffs or Kemira and/or Chemtrade. Instead, both sides agreed to the Settlements. That way, they avoid the cost and risk of a trial, and the Direct Purchaser Settlement Class Members affected will get compensation.

These Settlements are the product of extensive negotiations between lawyers for the Direct Purchaser Class Plaintiffs and Kemira and between the Direct Purchaser Class Plaintiffs and Chemtrade. The Direct Purchaser Class Plaintiffs and Interim DPP Lead Counsel think the Settlements are fair and in the best interests of all Direct Purchaser Settlement Class Members.

**WHO IS AFFECTED BY THE SETTLEMENTS**

**To see if you are affected by the Settlements, you first have to determine if you are a Direct Purchaser Settlement Class Member.**

**6. WHO IS INCLUDED IN THE DIRECT PURCHASER SETTLEMENT CLASS?**

The Court has preliminarily certified, for purposes of effectuating the Settlements only, a class consisting of: **all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.** Generally, you are included in the Direct Purchaser Settlement Class if you purchased Alum directly from a Defendant during this period.

Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.

**7. WHAT IF I AM STILL NOT SURE WHETHER I AM INCLUDED?**

If you are still not sure if you are a Direct Purchaser Settlement Class Member, you can get more information by visiting [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com), or you can get free help by calling or writing Interim DPP Lead Counsel, at the phone number and address listed in Question 23 below. You may also contact the Settlement Administrator, by calling 1-855-338-6128, by emailing [info@liquidaluminumchemtradesettlement.com](mailto:info@liquidaluminumchemtradesettlement.com), or writing to *Liquid Aluminum Sulfate Antitrust Litigation – Chemtrade Direct Purchaser Settlements*, c/o Settlement Administrator, P.O. Box 30097, Philadelphia, PA 19103.

### SUMMARY OF THE SETTLEMENTS

These are partial settlements. Pursuant to the Settlements, Kemira has agreed to pay a total of \$3.8 million in cash. Chemtrade has agreed to pay \$51 million in cash, plus assign certain indemnity rights against the former owners of General Chemical Corp, with a guarantee of \$5 million.

The net amount of the Settlement Funds, after payment of any taxes, administration expenses, and Court-approved attorneys' fees, expenses and Case Contribution Awards, will be allocated to Direct Purchaser Settlement Class Members, *pro rata*, according to a plan of distribution, approval of which will simultaneously be sought from the Court as part of the Settlements.

As with any litigated case, Direct Purchaser Class Plaintiffs would face an uncertain outcome against Kemira and Chemtrade if this lawsuit were to continue against them. Throughout this case, Direct Purchaser Class Plaintiffs, on the one hand, and Kemira and Chemtrade, on the other hand, have disagreed on both liability and damages, and they do not agree on the amount that would be recoverable even if Direct Purchaser Class Plaintiffs were to prevail at trial. Moreover, continued litigation could result in a judgment or verdict against Kemira or Chemtrade in an amount less than the recovery obtained by the Settlements, or no recovery at all. Kemira and Chemtrade have denied and continue to deny the claims and contentions alleged by Direct Purchaser Class Plaintiffs, that they are liable at all to the Direct Purchaser Settlement Class, or that the Direct Purchaser Settlement Class suffered any damages for which Kemira or Chemtrade could be legally responsible. Nevertheless, Kemira and Chemtrade have taken into account the uncertainty and risks inherent in any litigation, particularly in a complex case such as this, and have concluded that it is desirable that the lawsuit be fully and finally settled as to Kemira and Chemtrade on the terms and conditions set forth in the Settlement Agreements.

### BASIC INFORMATION

#### **1. WHY DID I GET THIS NOTICE?**

You received this Notice because it is believed that you or your company purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011, and therefore, you may be a member of the Direct Purchaser Settlement Class.

The Court has directed that this Notice be sent to you because, as a potential member of the Direct Purchaser Settlement Class, you have the right to know about the Settlements reached in this Action between the Direct Purchaser Class Plaintiffs, on behalf of the Direct Purchaser Settlement Class, and Kemira and Chemtrade and about all of your options before the Court decides whether to approve the Settlements. This Notice explains the lawsuit, the Settlements, and your legal rights.

The Court in charge of this Action is the United States District Court for the District of New Jersey. The case is called *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD). United States District Court Judge Jose L. Linares is overseeing this Action. The entities who brought this case are the plaintiffs, and the companies and individuals they sued are called defendants.

#### **2. WHAT IS THIS LAWSUIT ABOUT?**

The Direct Purchaser Class Plaintiffs claim that Kemira and Chemtrade participated in a conspiracy – with other Defendants in the Action and unnamed co-conspirators – to allocate territories and/or not to compete for each other's historical business by rigging bids, allocating customers and fixing, stabilizing, and maintaining the price of Alum sold in the United States from January 1, 1997 to at least February 28, 2011 in violation of the federal antitrust laws. The Direct Purchaser Class Plaintiffs allege that the claimed anticompetitive conduct resulted in artificially inflated prices for Alum. Kemira and Chemtrade deny all of these claims and have asserted various defenses to the claims. The Court has not made any decision as to the merits of Direct Purchaser Class Plaintiffs' allegations.

**Please Note:** The Settlements are partial settlements of the Action. The Settlements do not release any claims of the Direct Purchaser Class Plaintiffs and the other members of the Direct Purchaser Settlement Class against any other Defendant named in the Action and litigation against those Defendants is ongoing.

**WHAT THIS NOTICE CONTAINS**

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- The Settlements described in this Notice pertain only to **direct** purchasers of Alum (*i.e.*, those that purchased Alum in the United States directly from a Defendant). There is another lawsuit pending in the same Court that was brought on behalf of **indirect** purchasers, which are entities that purchased Alum from distributors or from other direct purchasers.
- The Court still has to decide whether to finally approve the Settlements. Approval of the Settlements by the Court will resolve the lawsuit against Kemira and Chemtrade only. The lawsuit is continuing against the other Defendants named in the Action.
- **Your legal rights will be affected whether or not you act.** This Notice includes important information about the lawsuit and the Settlements.

<b>A SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THESE SETTLEMENTS</b>	
<b>SUBMIT A CLAIM FORM POSTMARKED OR SUBMITTED ONLINE NO LATER THAN JUNE 13, 2019</b>	If you wish to make a claim against the Settlement Funds, you will need to submit a Claim Form in order to be eligible to receive a payment from the Settlements. The portion, if any, of the Settlement Funds to be allocated to you will be calculated on a <i>pro rata</i> basis based on your eligible purchases of Alum. ( <i>See</i> Questions 9-10).
<b>ASK TO BE EXCLUDED BY SUBMITTING A WRITTEN REQUEST FOR EXCLUSION SO THAT IT IS RECEIVED NO LATER THAN APRIL 2, 2019</b>	If you ask to be excluded from the Direct Purchaser Settlement Class and the Court approves the Settlements, you will not receive any money from the Settlements. This is the only option that allows you to be part of any other lawsuit against Kemira and/or Chemtrade for the claims in this case. ( <i>See</i> Question 13).
<b>OBJECT TO THE SETTLEMENTS BY SUBMITTING A WRITTEN OBJECTION SO THAT IT IS RECEIVED NO LATER THAN APRIL 2, 2019</b>	If you do not like the Settlements, or any part of them, you may write to the Court and explain why you do not like the Settlements. You can only object to the Settlements if you are a Direct Purchaser Settlement Class Member and you do not exclude yourself. ( <i>See</i> Question 17).
<b>GO TO THE COURT'S FINAL FAIRNESS HEARING ON APRIL 17, 2019</b>	If you submit a written objection, you may (but you do not have to) attend the hearing and, at the discretion of the Court, speak to the Court about your objection. ( <i>See</i> Questions 19-21).
<b>DO NOTHING</b>	You do not have to take any action to remain part of the Direct Purchaser Settlement Class. ( <i>See</i> Question 22). However, by doing nothing, you give up any rights to sue Kemira and Chemtrade about the claims in this case and you will not receive a payment from the Settlements.

**YOUR RIGHTS AND OPTIONS ARE EXPLAINED IN MORE DETAIL IN THIS NOTICE.  
PLEASE READ THIS NOTICE CAREFULLY AND COMPLETELY.**

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEW JERSEY**

In Re: LIQUID ALUMINUM SULFATE  
ANTITRUST LITIGATION

Civil Action No. 16-md-2687 (JLL) (JAD)

**IF YOU PURCHASED LIQUID ALUMINUM SULFATE IN THE UNITED STATES DIRECTLY FROM**  
**A DEFENDANT FROM JANUARY 1, 1997 THROUGH FEBRUARY 28, 2011,**  
**YOU COULD BE AFFECTED BY PROPOSED CLASS ACTION SETTLEMENTS**

*A federal court authorized this Notice. This is not a solicitation from a lawyer. You are not being sued.*

- This Notice is being sent to you pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the District of New Jersey (“Court”). The purpose of this Notice is to advise you of the pendency of the class action lawsuit called *In Re: Liquid Aluminum Sulfate Antitrust Litigation* (“Action”) and the proposed partial settlements (each a “Settlement,” together the “Settlements”) reached in the Action between Direct Purchaser Class Plaintiffs<sup>1</sup> and settling defendant Kemira Chemicals, Inc. (“Kemira”) and between Direct Purchaser Class Plaintiffs and settling defendants Chemtrade Logistics Income Fund; General Chemical Corporation; General Chemical LLC; General Chemical Performance Products, LLC; Chemtrade Chemicals Corporation; Chemtrade Chemicals US LLC; Chemtrade Solutions, LLC, and individual defendants Matthew LeBaron, Scott Wolff, Alex Avraamides, Frank Reichl, Amita Gupta, and Vincent Opalewski (together, “Chemtrade”).<sup>2</sup> The Court preliminarily approved the Settlements on February 6, 2019. **Please Note: The Settlements do not release any claims of Direct Purchaser Class Plaintiffs and the other members of the Direct Purchaser Settlement Class (as defined below) against any other Defendant named in the Action and litigation against those Defendants is ongoing.**<sup>3</sup>
- Pursuant to the Settlements, Kemira has agreed to pay a total of \$3.8 million in cash. Chemtrade has agreed to pay \$51 million in cash, plus assign certain indemnity rights against the former owners of General Chemical Corp, with a guarantee of recovery of at least an additional \$5 million. Kemira and Chemtrade deny all of Direct Purchaser Class Plaintiffs’ claims and deny all wrongdoing, but have agreed to settle in order to avoid the cost and risk of a trial.
- This lawsuit involves liquid aluminum sulfate or “Alum.” Alum is a chemical utilized by municipalities and industries for a variety of uses including, *inter alia*, treating drinking water, controlling algae in lakes and ponds, treating wastewater, manufacturing paper and pulp and fixing dyes to textiles. The Direct Purchaser Class Plaintiffs allege that Kemira and Chemtrade participated in a conspiracy – with other Defendants in the Action and unnamed co-conspirators – to allocate territories and/or not to compete for each other’s historical business by rigging bids, allocating customers and fixing, stabilizing, and maintaining the price of Alum sold in the United States from January 1, 1997 to at least February 28, 2011 in violation of the federal antitrust laws. Kemira and Chemtrade deny all of these claims and have asserted various defenses to the claims. The Court has not made any decision as to the merits of Direct Purchaser Class Plaintiffs’ claims against Kemira or Chemtrade because the Parties have agreed to settle these claims.

<sup>1</sup> Direct Purchaser Class Plaintiffs are Central Arkansas Water; City of Charlotte, North Carolina; City and County of Denver, Colorado, acting by and through its board of Water Commissioners; Flambeau River Papers, LLC; City of Greensboro, North Carolina; Mobile Area Water and Sewer System; City of Rochester, Minnesota; City of Sacramento, California; SUEZ Water Environmental Services Inc.; SUEZ Water New Jersey Inc.; SUEZ Water Princeton Meadows Inc.; SUEZ Water New York Inc.; SUEZ Water Pennsylvania Inc.; and City of Texarkana, Arkansas and City of Texarkana, Texas, d/b/a Texarkana Water Utilities.

<sup>2</sup> The full terms of the Settlements are set forth in the respective Settlement Agreements between Direct Purchaser Class Plaintiffs and Defendant Kemira Chemicals Inc., and between Direct Purchaser Class Plaintiffs and the Chemtrade Defendants, copies of which can be viewed on the Settlement website, [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). All capitalized terms used herein and not otherwise defined herein have the meanings set forth in the Settlement Agreements. In the event of any conflicts between the terms of this Notice and the Settlement Agreements, the Settlement Agreements shall control.

<sup>3</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, and Milton Sundbeck.

## OFFICE OF THE COUNTY ATTORNEY

**STAFFORD COUNTY  
ATTORNEY'S OFFICE**

1300 COURTHOUSE ROAD  
P.O. BOX 339  
STAFFORD, VIRGINIA 22555  
Phone: (540) 658-8636  
Fax: (540) 658-4530



**RYSHEDA M. MCCLENDON**  
COUNTY ATTORNEY

DAVID L. HONADLE  
DEPUTY COUNTY ATTORNEY  
JEANNISE G. EWING  
ASSISTANT COUNTY ATTORNEY  
LAUREN E. LUCIAN  
ASSISTANT COUNTY ATTORNEY

June 13, 2019

*Liquid Aluminum Sulfate Antitrust Litigation-  
Chemtrade Direct Purchaser Settlements*  
P.O. Box 30097  
Philadelphia, PA 19103

**Re: In Re: Liquid Aluminum Sulfate Antitrust Litigation, United States District Court  
District of New Jersey, Civil Action No. 16-md-2687 (JLL)(JAD)  
Claimant Form**

Dear Settlement Administrator,

Enclosed you will find the claimant's form and supporting documents for Stafford County, Virginia ("County"), referred to as Stafford County-Able Lake and Stafford County Dept. Utility.

Pursuant to the records retention laws of the Commonwealth of Virginia, the County does maintain complete records for liquid aluminum sulfate purchased from General Chemical Corporation and General Chemical Performance Products, LLC during the requested timeline, January 1, 1997 to February 28, 2011. The documents enclosed are all of the documents that are available and responsive to the enclosed form.

Sincerely,

  
Jeannise Galloway Ewing  
Assistant County Attorney

Angeion000073

**In Re: Liquid Aluminum Sulfate Antitrust Litigation**

**Claimant: Stafford County, Virginia (aka Stafford County-Abel Lake; Stafford County  
Dept. Utility)**

**Part III- Schedule of Qualifying Alum Purchases**

<b>Date of Purchase</b>	<b>Quantity of Alum</b>	<b>Dollar Amount of Alum Purchase (*Approximate Amount)</b>	<b>Proof of Purchase</b>
On or near 2/18/97	Unknown	Contract approved in the amount of \$108,810	Stafford County Board of Supervisors (BOS) Resolution Documents
7/16/98 - 1/22/99	Unknown	\$18,522.15*	Purchases listed on the Vendor Activity Listing; BOS Resolution Documents
2/23/99 – 2/16/00	Unknown	\$32,836.04*	Purchases listed on the Vendor Activity Listing; BOS Resolution Documents
2/24/00 –01/29/01	Unknown	\$30,725.01*	Purchases listed on the Vendor Activity Listing BOS Resolution Documents
2/23/01- 3/8/02	Unknown	\$43,143.78*	Purchases listed on the Vendor Activity Listing; BOS Resolution Documents
3/15/02 – 2/18/03	Unknown	\$51,433.44*	Purchases listed on the Vendor Activity Listing; BOS Resolution Documents
3/17/03 - 10/23/03	Unknown	\$11,412.50*	Purchases listed on the Vendor Activity Listing; BOS Resolution Documents
On or near 3/24/05	Unknown	Contract executed in the amount of \$179,377.00	Contract documents; BOS Resolution Documents
On or near 3/6/07	Unknown	Contract amendment approved in the amount of \$255,90.00	BOS Resolution Documents
Contract effective 7/1/08; Contract executed on 9/25/08.	Unknown	Contract amendment executed in the amount of \$471,764.00	Contract documents; BOS Resolution Documents
Contract effective 5/1/09; Contract executed on 6/3/09.	Unknown	Contract amendment executed in the amount of \$551,520.00	Contract documents
On or near 6/15/10	Unknown	Contract approved in the amount of 501,725.00	BOS Resolution Documents

Your claim must be  
postmarked by:

JUNE 13, 2019

*Liquid Aluminum Sulfate Antitrust Litigation –  
Chemtrade Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
[www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com)  
[info@liquidaluminumchemtradesettlement.com](mailto:info@liquidaluminumchemtradesettlement.com)

CHM

## PART II – CLAIMANT INFORMATION

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you MUST notify the Settlement Administrator in writing at the address above.

Claimant Names(s) (as the name(s) should appear on check, if eligible for payment):

City of Crystal Lake

Company

City of Crystal Lake

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Denver Schmitt

Mailing Address – Line 1: Street Address/P.O. Box:

100 W. Woodstock St.

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

Crystal Lake

State/Province:

IL

Zip Code:

60014

Country:

USA

Daytime Telephone Number:

815 356 3715

Evening Telephone Number:

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

dschmitt@crystallake.org

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

## PART I – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice that accompanies this Claim Form. The Notice describes the proposed Settlements with Kemira and with Chemtrade, how Direct Purchaser Settlement Class Members are affected by the Settlements, and the manner in which the Net Settlement Fund will be distributed if the Settlements are approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.

2. **To be eligible for a payment from the Settlements, you must be a Direct Purchaser Settlement Class Member. The Direct Purchaser Settlement Class is defined as all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.<sup>1</sup>** Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.

3. **Important - Please Note:** This Claim Form does not pertain to the settlements involving the indirect purchasers. Information about the indirect purchaser settlements with Kemira and Chemtrade can be found by visiting the website [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). **DO NOT SUBMIT THIS CLAIM FORM IF YOU ARE AN INDIRECT PURCHASER.**

4. By submitting this Claim Form, you will be making a request to share in the proceeds of the Settlements described in the Notice. **IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER (see definition of Direct Purchaser Settlement Class on page 5 of the Notice), OR IF YOU SUBMITTED A REQUEST FOR EXCLUSION FROM THE DIRECT PURCHASER SETTLEMENT CLASS, DO NOT SUBMIT A CLAIM FORM. YOU MAY NOT PARTICIPATE IN THE SETTLEMENTS IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER. THUS, IF YOU ARE EXCLUDED FROM THE DIRECT PURCHASER SETTLEMENT CLASS, ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.**

5. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.

6. Please be aware that there are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.

7. If the Court approves the Settlements, payments to eligible Direct Purchaser Settlement Class Members will be made after the Court grants final approval to the Settlements, after all appeals are resolved, and after the completion of all claims processing. This process could take substantial time. Please be patient.

8. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator, at the above address or by toll-free phone at 1-855-338-6128, or you may download the documents from the website [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). You may also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

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<sup>1</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, and Milton Sundbeck.

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased Directly from a Defendant	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: XX TONS	\$12,345	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, and Milton Sundbeck.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART IV – SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V – CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

~~UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HEREWITH ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.~~

Signature



9/12/2019  
Date

Print your name here

Gary Mayerhofer

Company Name

City of Crystal Lake

Capacity of Person Signing

City Manager

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**Your claim must  
be postmarked or  
received by:  
December 17, 2018**

**CLAIM FORM**  
*Liquid Aluminum Sulfate Antitrust Litigation – GEO*  
*Direct Purchaser Settlement*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
info@LiquidAluminumDirectSettlement.com  
[www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com)

**LAL**

**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Settlement Administrator in writing at the address above.

Claimant Name(s) (as the name(s) should appear on check, if eligible for payment). Provide **either** a First and Last Name **or** a Company Name (not both) to whom you would like a check made payable if your claim is eligible for payment. If you provide both, we will use your First and Last Name, not the Company Name:

First Name:

Last Name:

**OR**

Company Name:

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Mailing Address – Line 1: Street Address/P.O. Box:

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

State/Province:

Zip Code:

Country:

Daytime Telephone Number:

Evening Telephone Number:

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

Page 3

Angeion000079

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

<b>Date of Purchase</b>	<b>Quantity of Alum Purchased <u>Directly</u> from a Defendant*</b>	<b>Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)</b>	<b>Proof of Purchase Enclosed</b>
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,346	<input type="checkbox"/>
12/08/2003		\$ 1,342	<input type="checkbox"/>
03/08/2004		\$ 2,334	<input type="checkbox"/>
11/04/2004		\$ 2,440	<input type="checkbox"/>
03/10/2005		\$ 2,652	<input type="checkbox"/>
08/04/2005		\$ 2,660	<input type="checkbox"/>
04/04/2006		\$ 2,772	<input type="checkbox"/>
08/10/2006		\$ 2,654	<input type="checkbox"/>
02/09/2007		\$ 2,714	<input type="checkbox"/>
04/11/2008		\$ 3,070	<input type="checkbox"/>
12/05/2008		\$ 4,396	<input type="checkbox"/>
07/01/2009		\$ 4,632	<input type="checkbox"/>
01/07/2010		\$ 4,620	<input type="checkbox"/>

**\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).**

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased <u>Directly</u> from a Defendant*	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,346	<input type="checkbox"/>
01/07/2010		\$ 4,620	<input type="checkbox"/>
07/09/2010		\$ 4,649	<input type="checkbox"/>
01/31/2011		\$ 4,752	<input type="checkbox"/>
__/__/__		\$	<input type="checkbox"/>
__/__/__		\$	<input type="checkbox"/>
__/__/__		\$	<input type="checkbox"/>
__/__/__		\$	<input type="checkbox"/>
__/__/__		\$	<input type="checkbox"/>
__/__/__		\$	<input type="checkbox"/>
__/__/__		\$	<input type="checkbox"/>
__/__/__		\$	<input type="checkbox"/>
__/__/__		\$	<input type="checkbox"/>
__/__/__		\$	<input type="checkbox"/>

**\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).**

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**PART IV - SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the United States District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V - CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HERewith ARE TRUE AND CORRECT COPIES OF WHAT THEY PUR

09/12/18
Date
Signature

Cyrus McMains  
Print your name here

Yorkville-Bristol Sanitary District  
Company Name

Executive Director  
Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**REMINDER CHECKLIST**

1. Please sign the above certification.
2. Remember to attach only **copies** of acceptable supporting documentation as these documents will not be returned to you.
3. Please do not highlight any portion of the Claim Form or any supporting documents.
4. Keep copies of the completed Claim Form and documentation for your own records.
5. The Settlement Administrator will acknowledge receipt of your Claim Form by mail, within 60 days. Your claim is not deemed filed until you receive an acknowledgement postcard. **IF YOU DO NOT RECEIVE AN ACKNOWLEDGEMENT POSTCARD WITHIN 60 DAYS, PLEASE CALL THE SETTLEMENT ADMINISTRATOR TOLL FREE AT 1-855-338-6128.**
6. If your address changes in the future, or if this Claim Form was sent to an old or incorrect address, please send the Settlement Administrator written notification of your new address.
7. If you have any questions or concerns regarding your claim, please contact the Settlement Administrator at the above address, toll-free at 1-855-338-6128, by email at [info@LiquidAluminumDirectSettlement.com](mailto:info@LiquidAluminumDirectSettlement.com) or visit [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com).

**THIS CLAIM FORM MUST BE MAILED BY PREPAID, FIRST-CLASS MAIL, OR SUBMITTED ONLINE AT [WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM](http://WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM), POSTMARKED OR RECEIVED NO LATER THAN DECEMBER 17, 2018.**

A Claim Form received by the Settlement Administrator shall be deemed to have been submitted when posted, if a postmark date on or before December 17, 2018 is indicated on the envelope and it is mailed First Class, and addressed in accordance with the above instructions. In all other cases, a Claim Form shall be deemed to have been submitted when actually received by the Settlement Administrator.

**It will take a significant amount of time to fully process all of the Claim Forms. Please be patient.**

**Your claim must  
be postmarked or  
received by:  
December 17, 2018**

*Liquid Aluminum Sulfate Antitrust Litigation – GEO*  
*Direct Purchaser Settlement*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
info@LiquidAluminumDirectSettlement.com  
[www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com)

**LAL**

**CLAIM FORM FOR SETTLEMENT WITH THE GEO SETTLING PARTIES**

**IMPORTANT: PLEASE READ BEFORE COMPLETING THIS CLAIM FORM**

To be eligible for a payment from this Settlement, you must be a Direct Purchaser Settlement Class Member, *i.e.*, you must have purchased liquid aluminum sulfate (“Alum”) in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.

This Claim Form must be completed and returned by Direct Purchaser Settlement Class Members who seek to receive a payment from the partial settlement (“Settlement”) reached between the Direct Purchaser Class Plaintiffs and GEO Specialty Chemicals, Inc. (“GEO”), Kenneth A. Ghazey and Brian C. Steppig (collectively, the “GEO Settling Parties”) in the action captioned *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD) (“Action”).

THIS CLAIM FORM MUST BE COMPLETED AND MAILED BY PREPAID, FIRST-CLASS MAIL TO THE ABOVE ADDRESS, OR SUBMITTED ONLINE AT [WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM](http://WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM), **POSTMARKED OR RECEIVED NO LATER THAN DECEMBER 17, 2018** IN ORDER TO BE ELIGIBLE TO RECEIVE A SHARE OF THE NET SETTLEMENT FUND IN CONNECTION WITH THE SETTLEMENT.

FAILURE TO SUBMIT YOUR CLAIM FORM BY THE DATE SPECIFIED ABOVE WILL SUBJECT YOUR CLAIM TO REJECTION AND MAY PRECLUDE YOU FROM BEING ELIGIBLE TO RECEIVE ANY MONEY IN CONNECTION WITH THE SETTLEMENT.

**DO NOT MAIL OR DELIVER YOUR CLAIM FORM TO THE COURT, THE PARTIES, OR THEIR COUNSEL. SUBMIT YOUR CLAIM FORM ONLY TO THE SETTLEMENT ADMINISTRATOR AT THE ADDRESS SET FORTH ABOVE.**

If you have questions regarding your Claim Form, please call 1-855-338-6128 or send an email to info@LiquidAluminumDirectSettlement.com. Members of the Direct Purchaser Settlement Class who do not timely and validly seek exclusion from the Direct Purchaser Settlement Class in accordance with the instructions set forth in the Notice will be bound by the judgment entered approving this Settlement as to the GEO Settling Parties regardless of whether they submit a Claim Form.

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***\*Pages 3, 4 and 5 of this Claim Form must be completed and returned to the Settlement Administrator***

#### PART I – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice that accompanies this Claim Form. The Notice describes the proposed Settlement with the GEO Settling Parties, how Direct Purchaser Settlement Class Members are affected by the Settlement, and the manner in which the Net Settlement Fund will be distributed if the Settlement is approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.

2. **To be eligible for a payment from the Settlement, you must be a Direct Purchaser Settlement Class Member. The Direct Purchaser Settlement Class is defined as all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.<sup>1</sup>** Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.

3. **Important - Please Note:** There is a related settlement with entities that purchased Alum from distributors or from other direct purchasers (*i.e.*, “indirect purchasers”). This Claim Form does not pertain to the settlement involving the indirect purchasers. Information about the settlement between the indirect purchasers and the GEO Settling Parties can be found by visiting the website [www.LiquidAluminumSulfate.com](http://www.LiquidAluminumSulfate.com). **DO NOT SUBMIT THIS CLAIM FORM IF YOU ARE AN INDIRECT PURCHASER.**

4. By submitting this Claim Form, you will be making a request to share in the proceeds of the Settlement described in the Notice. **IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER** (*see* definition of Direct Purchaser Settlement Class on page 5 of the Notice), **OR IF YOU SUBMITTED A REQUEST FOR EXCLUSION FROM THE DIRECT PURCHASER SETTLEMENT CLASS, DO NOT SUBMIT A CLAIM FORM. YOU MAY NOT PARTICIPATE IN THE SETTLEMENT IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER. THUS, IF YOU ARE EXCLUDED FROM THE DIRECT PURCHASER SETTLEMENT CLASS, ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.**

5. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.

6. Please be aware that there are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.

7. If the Court approves the Settlement, payments to eligible Direct Purchaser Settlement Class Members will be made after the Court grants final approval to the Settlement, after all appeals are resolved, and after the completion of all claims processing. This process could take substantial time. Please be patient.

8. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator, at the above address or by toll-free phone at 1-855-338-6128, or you may download the documents from the website [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com). You may also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

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<sup>1</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GFO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**Your claim must  
be postmarked or  
received by:  
December 17, 2018**

**CLAIM FORM**  
*Liquid Aluminum Sulfate Antitrust Litigation – GEO*  
*Direct Purchaser Settlement*  
c/o Settlement Administrator  
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Philadelphia, PA 19103  
1-855-338-6128  
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**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Settlement Administrator in writing at the address above.

Claimant Name(s) (as the name(s) should appear on check, if eligible for payment). Provide **either** a First and Last Name **or** a Company Name (not both) to whom you would like a check made payable if your claim is eligible for payment. If you provide both, we will use your First and Last Name, not the Company Name:

First Name:

Last Name:

**OR**

Company Name:

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Mailing Address – Line 1: Street Address/P.O. Box:

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

State/Province:

Zip Code:

Country:

Daytime Telephone Number:

Evening Telephone Number:

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

## PART I – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice that accompanies this Claim Form. The Notice describes the proposed Settlement with the GEO Settling Parties, how Direct Purchaser Settlement Class Members are affected by the Settlement, and the manner in which the Net Settlement Fund will be distributed if the Settlement is approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.
2. **To be eligible for a payment from the Settlement, you must be a Direct Purchaser Settlement Class Member. The Direct Purchaser Settlement Class is defined as all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.**<sup>1</sup> Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.
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5. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.
6. Please be aware that there are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.
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8. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator, at the above address or by toll-free phone at 1-855-338-6128, or you may download the documents from the website [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com). You may also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

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<sup>1</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased <u>Directly</u> from a Defendant*	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
			<input type="checkbox"/>
03/18/1997	22,164.06 lbs.	\$ 1,473.91	<input checked="" type="checkbox"/>
06/13/1997	22,407 lbs.	\$ 1,490.07	<input checked="" type="checkbox"/>
08/06/1997	21,381 lbs.	\$ 1,421.84	<input checked="" type="checkbox"/>
09/24/1997	21,495 lbs.	\$ 1,429.42	<input checked="" type="checkbox"/>
11/04/1997	21,390.2 lbs.	\$ 1,422.44	<input checked="" type="checkbox"/>
01/15/1998	21,040 lbs.	\$ 1,399.16	<input checked="" type="checkbox"/>
04/23/1999	22,182.5 lbs.	\$ 1,408.59	<input checked="" type="checkbox"/>
06/10/1999	22,282.5 lbs.	\$ 1,414.94	<input checked="" type="checkbox"/>
07/21/1999	22,322.36 lbs.	\$ 1,417.47	<input checked="" type="checkbox"/>
09/13/1999	22,422.36 lbs.	\$ 1,423.82	<input checked="" type="checkbox"/>
11/08/1999	22,382.36 lbs.	\$ 1,421.28	<input checked="" type="checkbox"/>
12/27/1999	22,422.36 lbs.	\$ 1,423.82	<input checked="" type="checkbox"/>

\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

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Date of Purchase	Quantity of Alum Purchased <u>Directly</u> from a Defendant*	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
04/03/2000	22,457.3 lbs.	\$ 1,452.99	<input checked="" type="checkbox"/>
06/02/2000	22,337.25 lbs.	\$ 1,445.22	<input checked="" type="checkbox"/>
08/17/2000	22,437.4 lbs.	\$ 1,451.70	<input checked="" type="checkbox"/>
11/02/2000	22,457.34 lbs.	\$ 1,452.99	<input checked="" type="checkbox"/>
02/01/2001	22,557.5 lbs.	\$ 1,459.47	<input checked="" type="checkbox"/>
04/03/2003	46,500 lbs.	\$ 2,785.35	<input checked="" type="checkbox"/>
06/20/2003	46,860 lbs.	\$ 2,806.91	<input checked="" type="checkbox"/>
09/26/2003	46,940 lbs.	\$ 2,811.71	<input checked="" type="checkbox"/>
12/19/2003	46,640 lbs.	\$ 2,793.74	<input checked="" type="checkbox"/>
03/15/2004	46,680 lbs.	\$ 2,796.13	<input checked="" type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>

\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).

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<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

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Date of Purchase	Quantity of Alum Purchased <u>Directly</u> from a Defendant*	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: XX TONS	\$12,346	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>

See enclosed

**\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).**

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART IV - SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the United States District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V - CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HEREWITH ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

Signature

Date

Deborah Lang  
Print your name here

City of Aurora  
Company Name

Assistant Corporation Counsel  
Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**



# City of Aurora

44 E. Downer Place • Aurora, Illinois 60507 • Law Department Phone: 630-256-3060 •

**Richard C. Irvin**  
Mayor

**October 2, 2018**

**Liquor Aluminum Sulfate Antitrust Litigation – GEO  
Direct Purchaser Settlement  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103**

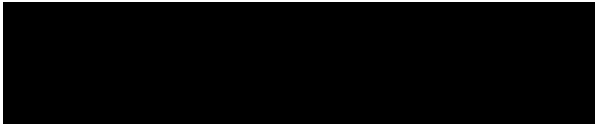
**Re: Claim Form**

**To Whom It May Concern:**

**Enclosed please find the claim form regarding Liquid Aluminum Sulfate Antitrust Litigation as well as  
schedule of purchases and receipts.**

**Please feel free to contact me should you have questions or need further information.**

**Very truly yours.**



**Assistant Corporation Counsel**

**DAL:las  
Enclosures**

Angeion000092

**Your claim must  
be postmarked or  
received by:  
December 17, 2018**

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Last Name:

**OR**

Company Name:

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Mailing Address – Line 1: Street Address/P.O. Box:

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

State/Province:

Zip Code:

Country:

Daytime Telephone Number:

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2. **To be eligible for a payment from the Settlement, you must be a Direct Purchaser Settlement Class Member. The Direct Purchaser Settlement Class is defined as all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.<sup>1</sup>** Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.
3. **Important - Please Note:** There is a related settlement with entities that purchased Alum from distributors or from other direct purchasers (*i.e.*, “indirect purchasers”). This Claim Form does not pertain to the settlement involving the indirect purchasers. Information about the settlement between the indirect purchasers and the GEO Settling Parties can be found by visiting the website [www.LiquidAluminumSulfate.com](http://www.LiquidAluminumSulfate.com). **DO NOT SUBMIT THIS CLAIM FORM IF YOU ARE AN INDIRECT PURCHASER.**
4. By submitting this Claim Form, you will be making a request to share in the proceeds of the Settlement described in the Notice. **IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER (see definition of Direct Purchaser Settlement Class on page 5 of the Notice), OR IF YOU SUBMITTED A REQUEST FOR EXCLUSION FROM THE DIRECT PURCHASER SETTLEMENT CLASS, DO NOT SUBMIT A CLAIM FORM. YOU MAY NOT PARTICIPATE IN THE SETTLEMENT IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER. THUS, IF YOU ARE EXCLUDED FROM THE DIRECT PURCHASER SETTLEMENT CLASS, ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.**
5. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.
6. Please be aware that there are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.
7. If the Court approves the Settlement, payments to eligible Direct Purchaser Settlement Class Members will be made after the Court grants final approval to the Settlement, after all appeals are resolved, and after the completion of all claims processing. This process could take substantial time. Please be patient.
8. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator, at the above address or by toll-free phone at 1-855-338-6128, or you may download the documents from the website [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com). You may also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

<sup>1</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

### PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased <u>Directly</u> from a Defendant*	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,346	<input type="checkbox"/>
__/__/__	SEE ATTACHED	\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>

**\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).**

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

\$890,992.32

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

#### PART IV - SUBMISSION TO JURISDICTION OF THE DISTRICT COURT

By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the United States District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

#### PART V - CERTIFICATION

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HERewith ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

\_\_\_\_\_  
Signature of claimant

11/30/2018

\_\_\_\_\_  
Date

Thomas Benedick  
\_\_\_\_\_  
Print your name here

Summerfield, Lebanon, Mascoutah Water Commission  
\_\_\_\_\_  
Company Name

Attorney at Law  
\_\_\_\_\_  
Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**Your claim must  
be postmarked or  
received by:  
December 17, 2018**

**CLAIM FORM**  
*Liquid Aluminum Sulfate Antitrust Litigation – GEO  
Direct Purchaser Settlement*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
info@LiquidAluminumDirectSettlement.com  
[www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com)

**LAL**

**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Settlement Administrator in writing at the address above.

Claimant Name(s) (as the name(s) should appear on check, if eligible for payment). Provide **either** a First and Last Name **or** a Company Name (not both) to whom you would like a check made payable if your claim is eligible for payment. If you provide both, we will use your First and Last Name, not the Company Name:

First Name:

Last Name:

**OR**

Company Name:

CITY OF WILLIAMSBURG

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

401 Lafayette Street

Mailing Address – Line 1: Street Address/P.O. Box:

City Attorney's Office

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

State/Province:

Zip Code:

Country:

Williamsburg

VA

23185

USA

Daytime Telephone Number:

Evening Telephone Number:

757-220-6253

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

cshelton@williamsburgva.gov

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased <u>Directly</u> from a Defendant*	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,346	<input type="checkbox"/>
<u>07/09/03</u>	12.22	\$1,540	<input checked="" type="checkbox"/>
<u>07/17/03</u>	11.72	\$1,477	<input checked="" type="checkbox"/>
<u>08/05/03</u>	11.64	\$1,467	<input checked="" type="checkbox"/>
<u>08/27/03</u>	12.18	\$1,535	<input checked="" type="checkbox"/>
<u>09/19/03</u>	12.00	\$1,512	<input checked="" type="checkbox"/>
<u>10/14/03</u>	11.82	\$1,489	<input checked="" type="checkbox"/>
<u>11/07/03</u>	11.98	\$1,509	<input checked="" type="checkbox"/>
<u>12/04/03</u>	12.08	\$1,522	<input checked="" type="checkbox"/>
<u>12/22/03</u>	12.05	\$1,518	<input checked="" type="checkbox"/>
<u>01/19/04</u>	12.00	\$1,512	<input checked="" type="checkbox"/>
<u>02/10/04</u>	12.00	\$1,512	<input checked="" type="checkbox"/>
<u>02/26/04</u>	12.03	\$1,516	<input checked="" type="checkbox"/>

\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

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Date of Purchase	Quantity of Alum Purchased <u>Directly</u> from a Defendant*	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,346	<input type="checkbox"/>
<u>03/27/04</u>	12.25	\$ <u>1,544</u>	<input checked="" type="checkbox"/>
<u>04/14/04</u>	12.79	\$ <u>1,486</u>	<input checked="" type="checkbox"/>
<u>04/27/04</u>	12.06	\$ <u>1,520</u>	<input checked="" type="checkbox"/>
<u>05/13/04</u>	12.11	\$ <u>1,526</u>	<input checked="" type="checkbox"/>
<u>05/28/04</u>	11.91	\$ <u>1,501</u>	<input checked="" type="checkbox"/>
<u>06/17/04</u>	12.20	\$ <u>1,537</u>	<input checked="" type="checkbox"/>
<u>06/28/04</u>	12.32	\$ <u>1,552</u>	<input checked="" type="checkbox"/>
<u>  /  /  </u>		\$ <u>          </u>	<input type="checkbox"/>
<u>  /  /  </u>		\$ <u>          </u>	<input type="checkbox"/>
<u>  /  /  </u>		\$ <u>          </u>	<input type="checkbox"/>
<u>  /  /  </u>		\$ <u>          </u>	<input type="checkbox"/>
<u>  /  /  </u>		\$ <u>          </u>	<input type="checkbox"/>

**\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).**

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.


**PART IV - SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the United States District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V - CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HEREWITH ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE. 

  
Signature of Claimant

12/17/2018

Date

Christina Shelton

Print your name here

City of Williamsburg, Virginia

Company Name

City Attorney

Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**Your claim must  
be postmarked or  
received by:  
December 17, 2018**

**CLAIM FORM**  
*Liquid Aluminum Sulfate Antitrust Litigation – GEO*  
*Direct Purchaser Settlement*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
info@LiquidAluminumDirectSettlement.com  
www.LiquidAluminumDirectSettlement.com

**LAL**

**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Settlement Administrator in writing at the address above.

Claimant Name(s) (as the name(s) should appear on check, if eligible for payment). Provide **either** a First and Last Name **or** a Company Name (not both) to whom you would like a check made payable if your claim is eligible for payment. If you provide both, we will use your First and Last Name, not the Company Name:

First Name:

Last Name:

**OR**

Company Name:

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Mailing Address – Line 1: Street Address/P.O. Box:

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

State/Province:

Zip Code:

Country:

Daytime Telephone Number:

Evening Telephone Number:

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

## PART I – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice that accompanies this Claim Form. The Notice describes the proposed Settlement with the GEO Settling Parties, how Direct Purchaser Settlement Class Members are affected by the Settlement, and the manner in which the Net Settlement Fund will be distributed if the Settlement is approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.
2. **To be eligible for a payment from the Settlement, you must be a Direct Purchaser Settlement Class Member. The Direct Purchaser Settlement Class is defined as all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.<sup>1</sup>** Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.
3. **Important - Please Note:** There is a related settlement with entities that purchased Alum from distributors or from other direct purchasers (*i.e.*, “indirect purchasers”). This Claim Form does not pertain to the settlement involving the indirect purchasers. Information about the settlement between the indirect purchasers and the GEO Settling Parties can be found by visiting the website [www.LiquidAluminumSulfate.com](http://www.LiquidAluminumSulfate.com). **DO NOT SUBMIT THIS CLAIM FORM IF YOU ARE AN INDIRECT PURCHASER.**
4. By submitting this Claim Form, you will be making a request to share in the proceeds of the Settlement described in the Notice. **IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER** (*see* definition of Direct Purchaser Settlement Class on page 5 of the Notice), **OR IF YOU SUBMITTED A REQUEST FOR EXCLUSION FROM THE DIRECT PURCHASER SETTLEMENT CLASS, DO NOT SUBMIT A CLAIM FORM. YOU MAY NOT PARTICIPATE IN THE SETTLEMENT IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER. THUS, IF YOU ARE EXCLUDED FROM THE DIRECT PURCHASER SETTLEMENT CLASS, ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.**
5. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.
6. Please be aware that there are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.
7. If the Court approves the Settlement, payments to eligible Direct Purchaser Settlement Class Members will be made after the Court grants final approval to the Settlement, after all appeals are resolved, and after the completion of all claims processing. This process could take substantial time. Please be patient.
8. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator, at the above address or by toll-free phone at 1-855-338-6128, or you may download the documents from the website [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com). You may also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

<sup>1</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

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Date of Purchase	Quantity of Alum Purchased <u>Directly</u> from a Defendant*	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,346	<input type="checkbox"/>
<u>01/13/2006</u>	9.46 tons	\$ <u>1,648</u>	<input checked="" type="checkbox"/>
<u>03/10/2006</u>	9.42 tons	\$ <u>1,641</u>	<input checked="" type="checkbox"/>
<u>04/14/2006</u>	9.56 tons	\$ <u>1,666</u>	<input checked="" type="checkbox"/>
<u>05/12/2006</u>	9.34 tons	\$ <u>1,627</u>	<input checked="" type="checkbox"/>
<u>06/27/2006</u>	10.76 tons	\$ <u>1,875</u>	<input checked="" type="checkbox"/>
<u>06/09/2006</u>	9.43 tons	\$ <u>1,643</u>	<input checked="" type="checkbox"/>
<u>07/18/2006</u>	10.74 tons	\$ <u>1,871</u>	<input checked="" type="checkbox"/>
<u>08/04/2006</u>	9.41 tons	\$ <u>1,639</u>	<input checked="" type="checkbox"/>
<u>08/21/2006</u>	9.44 tons	\$ <u>1,645</u>	<input checked="" type="checkbox"/>
<u>09/14/2006</u>	9.33 tons	\$ <u>1,625</u>	<input checked="" type="checkbox"/>
<u>10/19/2006</u>	9.55 tons	\$ <u>1,664</u>	<input checked="" type="checkbox"/>
<u>12/05/2006</u>	9.41 tons	\$ <u>1,639</u>	<input checked="" type="checkbox"/>

**\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).**

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<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART IV - SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the United States District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V - CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HEREWITH ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

\_\_\_\_\_  
Signature of claimant

12-14-18  
\_\_\_\_\_  
Date

John Hicks  
\_\_\_\_\_  
Print your name here

City of Gillespie  
\_\_\_\_\_  
Company Name

MAYOR  
\_\_\_\_\_  
Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**Your claim must  
be postmarked or  
received by:  
December 17, 2018**

**CLAIM FORM**  
*Liquid Aluminum Sulfate Antitrust Litigation – GEO*  
*Direct Purchaser Settlement*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
info@LiquidAluminumDirectSettlement.com  
[www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com)

**LAL**

**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Settlement Administrator in writing at the address above.

Claimant Name(s) (as the name(s) should appear on check, if eligible for payment). Provide either a First and Last Name or a Company Name (not both) to whom you would like a check made payable if your claim is eligible for payment. If you provide both, we will use your First and Last Name, not the Company Name:

First Name:

Last Name:

**OR**

Company Name:

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Mailing Address – Line 1: Street Address/P.O. Box:

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

State/Province:

Zip Code:

Country:

Daytime Telephone Number:

Evening Telephone Number:

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

### **PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

**See Exhibit A – Affidavit of Jianchong Luo and supporting documentation; and**

**See Exhibit B – Affidavit of Tamara Jean Walters and supporting documentation.**

**\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).**

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

\$2,797,725.00

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART IV - SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the United States District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V - CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HEREWITH ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

Sign

Jacob P. Stroman

Print your name here

City of Chesapeake

Company Name

City Attorney

Capacity of Person Signing

12/17/2018  
Date

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**REMINDER CHECKLIST**

1. Please sign the above certification.
2. Remember to attach only **copies** of acceptable supporting documentation as these documents will not be returned to you.
3. Please do not highlight any portion of the Claim Form or any supporting documents.
4. Keep copies of the completed Claim Form and documentation for your own records.
5. The Settlement Administrator will acknowledge receipt of your Claim Form by mail, within 60 days. Your claim is not deemed filed until you receive an acknowledgement postcard. **IF YOU DO NOT RECEIVE AN ACKNOWLEDGEMENT POSTCARD WITHIN 60 DAYS, PLEASE CALL THE SETTLEMENT ADMINISTRATOR TOLL FREE AT 1-855-338-6128.**
6. If your address changes in the future, or if this Claim Form was sent to an old or incorrect address, please send the Settlement Administrator written notification of your new address.
7. If you have any questions or concerns regarding your claim, please contact the Settlement Administrator at the above address, toll-free at 1-855-338-6128, by email at [info@LiquidAluminumDirectSettlement.com](mailto:info@LiquidAluminumDirectSettlement.com) or visit [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com).

**THIS CLAIM FORM MUST BE MAILED BY PREPAID, FIRST-CLASS MAIL, OR SUBMITTED ONLINE AT WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM, POSTMARKED OR RECEIVED NO LATER THAN DECEMBER 17, 2018.**

A Claim Form received by the Settlement Administrator shall be deemed to have been submitted when posted, if a postmark date on or before December 17, 2018 is indicated on the envelope and it is mailed First Class, and addressed in accordance with the above instructions. In all other cases, a Claim Form shall be deemed to have been submitted when actually received by the Settlement Administrator.

**It will take a significant amount of time to fully process all of the Claim Forms. Please be patient.**

Your claim must  
be postmarked or  
received by:  
**December 17, 2018**

*Liquid Aluminum Sulfate Antitrust Litigation – GEO*  
*Direct Purchaser Settlement*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
info@LiquidAluminumDirectSettlement.com  
[www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com)

**LAL**

**CLAIM FORM FOR SETTLEMENT WITH THE GEO SETTLING PARTIES**

**IMPORTANT: PLEASE READ BEFORE COMPLETING THIS CLAIM FORM**

To be eligible for a payment from this Settlement, you must be a Direct Purchaser Settlement Class Member, *i.e.*, you must have purchased liquid aluminum sulfate ("Alum") in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.

This Claim Form must be completed and returned by Direct Purchaser Settlement Class Members who seek to receive a payment from the partial settlement ("Settlement") reached between the Direct Purchaser Class Plaintiffs and GEO Specialty Chemicals, Inc. ("GEO"), Kenneth A. Ghazey and Brian C. Steppig (collectively, the "GEO Settling Parties") in the action captioned *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD) ("Action").

THIS CLAIM FORM MUST BE COMPLETED AND MAILED BY PREPAID, FIRST-CLASS MAIL TO THE ABOVE ADDRESS, OR SUBMITTED ONLINE AT [WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM](http://WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM), POSTMARKED OR RECEIVED NO LATER THAN **DECEMBER 17, 2018** IN ORDER TO BE ELIGIBLE TO RECEIVE A SHARE OF THE NET SETTLEMENT FUND IN CONNECTION WITH THE SETTLEMENT.

FAILURE TO SUBMIT YOUR CLAIM FORM BY THE DATE SPECIFIED ABOVE WILL SUBJECT YOUR CLAIM TO REJECTION AND MAY PRECLUDE YOU FROM BEING ELIGIBLE TO RECEIVE ANY MONEY IN CONNECTION WITH THE SETTLEMENT.

**DO NOT MAIL OR DELIVER YOUR CLAIM FORM TO THE COURT, THE PARTIES, OR THEIR COUNSEL. SUBMIT YOUR CLAIM FORM ONLY TO THE SETTLEMENT ADMINISTRATOR AT THE ADDRESS SET FORTH ABOVE.**

If you have questions regarding your Claim Form, please call 1-855-338-6128 or send an email to info@LiquidAluminumDirectSettlement.com. Members of the Direct Purchaser Settlement Class who do not timely and validly seek exclusion from the Direct Purchaser Settlement Class in accordance with the instructions set forth in the Notice will be bound by the judgment entered approving this Settlement as to the GEO Settling Parties regardless of whether they submit a Claim Form.

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<b>PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES</b>	<b>4</b>
<b>PART IV – SUBMISSION TO JURISDICTION OF THE DISTRICT COURT</b>	<b>5</b>
<b>PART V – CERTIFICATION</b>	<b>5</b>
<b>REMINDER CHECKLIST</b>	<b>6</b>

***\*Pages 3, 4 and 5 of this Claim Form must be completed and returned to the Settlement Administrator***

## PART I – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice that accompanies this Claim Form. The Notice describes the proposed Settlement with the GEO Settling Parties, how Direct Purchaser Settlement Class Members are affected by the Settlement, and the manner in which the Net Settlement Fund will be distributed if the Settlement is approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.

2. To be eligible for a payment from the Settlement, you must be a Direct Purchaser Settlement Class Member. The Direct Purchaser Settlement Class is defined as all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.<sup>1</sup> Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.

3. **Important - Please Note:** There is a related settlement with entities that purchased Alum from distributors or from other direct purchasers (i.e., "indirect purchasers"). This Claim Form does not pertain to the settlement involving the indirect purchasers. Information about the settlement between the indirect purchasers and the GEO Settling Parties can be found by visiting the website [www.LiquidAluminumSulfate.com](http://www.LiquidAluminumSulfate.com). DO NOT SUBMIT THIS CLAIM FORM IF YOU ARE AN INDIRECT PURCHASER.

4. By submitting this Claim Form, you will be making a request to share in the proceeds of the Settlement described in the Notice. IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER (see definition of Direct Purchaser Settlement Class on page 5 of the Notice), OR IF YOU SUBMITTED A REQUEST FOR EXCLUSION FROM THE DIRECT PURCHASER SETTLEMENT CLASS, DO NOT SUBMIT A CLAIM FORM. YOU MAY NOT PARTICIPATE IN THE SETTLEMENT IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER. THUS, IF YOU ARE EXCLUDED FROM THE DIRECT PURCHASER SETTLEMENT CLASS, ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.

5. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.

6. Please be aware that there are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.

7. If the Court approves the Settlement, payments to eligible Direct Purchaser Settlement Class Members will be made after the Court grants final approval to the Settlement, after all appeals are resolved, and after the completion of all claims processing. This process could take substantial time. Please be patient.

8. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator, at the above address or by toll-free phone at 1-855-338-6128, or you may download the documents from the website [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com). You may also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

<sup>1</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reich, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.



**City of Chesapeake**

Office of the City Attorney  
306 Cedar Road  
Chesapeake, Virginia 23322  
(757) 382-6586  
Fax (757) 382-8749

December 17, 2018

**VIA CERTIFIED MAIL: 7005-3110-0004-4308-1926**

Liquid Aluminum Sulfate Antitrust Litigation - GEO  
Direct Purchaser Settlement  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103

Dear Settlement Administrator:

Enclosed for your review and consideration is the City of Chesapeake's executed claim form and supporting documentation.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely yours,



Ellen F. Bergren  
Assistant City Attorney IV

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

\_\_\_\_\_  
IN RE: LIQUID ALUMINUM SULFATE )  
ANTITRUST LITIGATION )  
\_\_\_\_\_) )  
\_\_\_\_\_)

16-md-2687 (JLL) (JAD)  
(MDL 2687)

**AFFIDAVIT OF JIANCHONG LUO**

1. I, Jianchong Luo, declare under penalty of perjury that the foregoing is true and correct:
2. I give this affidavit on my personal knowledge for use in connection with the above-referenced case. I am over the age of eighteen and competent to make this affidavit.
3. I currently hold the title of Procurement Specialist II in the City of Chesapeake's ("City's") Purchasing Division.
4. The Purchasing Division is a division of the City Manager's Office and is headed by the Procurement Administrator.
5. I have been employed with the City's Purchasing Division since January 12, 2015.
6. The Purchasing Division utilizes the Oracle PeopleSoft ("PeopleSoft") software, among other things, to create, manage, and process the City's purchase orders.
7. The Procurement Administrator's signature is affixed to all purchase orders.
8. In my capacity as a Procurement Specialist II, I create, review, and process purchase orders with PeopleSoft.
9. From June 2016 to June 2017, I served as the PeopleSoft subject-matter expert for the Purchasing Division, and have worked daily with PeopleSoft for more than three years.

Exhibit A

Angeion000112

10. The purchase orders appended hereto are true and accurate copies of purchase orders that were printed from PeopleSoft, at the instruction of the City Attorney's Office, to provide evidence of the City's purchases of liquid aluminum sulfate ("liquid alum") from General Chemical Performance Products, LLC, located in Parsippany, New Jersey ("General Chemical").

11. The attached purchase orders evidence the City's purchases of liquid alum from General Chemical from July 1, 2005, through February 28, 2011.

12. The purchase orders were generated at or near the time of the City's purchases from General Chemical.

13. Purchases orders are kept in the ordinary course of regularly conducted Purchasing Division business.

14. Making and keeping purchase orders is a regular practice of the City's Purchasing Division.

15. PeopleSoft has a security feature whereby users are unable to dispatch purchase orders, i.e., print them out, once the purchase order ("PO") has been closed. Thus, when utilizing the "Print POs" function in PeopleSoft, the system will print closed POs, but it will not print the PO with an image of the Procurement Administrator's signature. Instead, the purchase order will print the word "UNAUTHORIZED" where the Procurement Administrator's signature would have originally appeared, before the PO was closed.

16. The word "UNAUTHORIZED" on the bottom of the purchase orders appended hereto has no impact whatsoever on the accuracy or veracity of these purchase orders. It is a security feature to prevent fraud.

17. The City also purchased liquid alum from General Chemical through what are known as "Non-PO vouchers." These purchases do not generate a purchase order.

18. The Excel spreadsheet, attached hereto, is a true and accurate summary of the City's purchasing transactions for liquid alum from General Chemical from July 1, 2005, through February 28, 2011, and represents the City's purchases through purchase orders and Non-PO vouchers.

19. From July 1, 2005, through February 28, 2011, the City purchased a total of \$1,603,219.00 of liquid alum from General Chemical, rounded to the nearest dollar amount, as indicated on the attached Excel spreadsheet.

— [REDACTED] —  
Jianchong Luo

COMMONWEALTH OF VIRGINIA  
CITY OF Chesapeake, to-wit:

I, the undersigned, a Notary Public in and for the City and State aforesaid, do hereby certify that, Jianchong Luo, Procurement Specialist II, whose name is signed to this Affidavit, is personally known to me and has acknowledged the same before me in my presence in the City and State aforesaid, this 14<sup>th</sup> day of December, 2018.

My commission expires: 10.31.22

Registration No: 7594696



UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

\_\_\_\_\_  
IN RE: LIQUID ALUMINUM SULFATE )  
ANTITRUST LITIGATION )  
\_\_\_\_\_) )  
\_\_\_\_\_)

16-md-2687 (JLL) (JAD)  
(MDL 2687)

**AFFIDAVIT OF TAMARA JEAN WALTERS**

1. I, Tamara Jean Walters, declare under penalty of perjury that the foregoing is true and correct:

2. I give this affidavit on my personal knowledge for use in connection with the above-referenced case. I am over the age of eighteen and competent to make this affidavit.

3. I currently hold the title of Accountant IV in the City of Chesapeake's ("City's") Department of Finance.

4. I have been employed with the City's Department of Finance ("Finance") since February 7, 2005.

5. The records appended hereto are true and accurate copies of historical purchase order records that I retrieved and printed from the City's "Mainframe," at the instruction of the City Attorney's Office, to provide evidence of the City's purchases of liquid aluminum sulfate ("liquid alum") from General Chemical Performance Products, LLC, located in Parsippany, New Jersey ("General Chemical").

6. The Mainframe was the City's financial accounting system from 1999 until June 30, 2005.

7. I worked with the financial accounting system module of the Mainframe from December 2004 (when employed as a temporary worker), until June 30, 2005, when the City began

**Exhibit B**

Angeion000115

to utilize the Oracle PeopleSoft software ("PeopleSoft"), which (among other things), creates, manages, and processes the City's purchase orders.

8. I presently utilize Mainframe's financial accounting system module for periodic financial reporting research, as well as researching other modules, in my capacity as an Accountant IV.

9. Before PeopleSoft was utilized, the City's Purchasing Division created and managed its purchase orders with a software system known as "BuySpeed."

10. On a nightly basis, City purchase orders created in BuySpeed would be imported into the Mainframe, as a batch entry.

11. Once the purchase order data was imported into the Mainframe, the City keyed vouchers and Finance would generate payments against these vouchers based upon this purchase order data.

12. From 1999 to June 30, 2005, Finance paid vouchers based upon purchase orders that were uploaded to the Mainframe from Buyspeed.

13. The Mainframe's purchase order data was generated at or near the time the purchases orders were created in BuySpeed.

14. The Mainframe's purchase order data was kept in the ordinary course of regularly conducted City business.

15. The making and keeping of purchase order data in the Mainframe was a regular practice of the City from 1999 until June 30, 2005.

16. On December 12, 2018, I researched the City's financial accounting system module in the Mainframe to locate and retrieve the City's purchase orders for liquid alum from General Chemical. I retrieved eight (8) historical purchase order records with General Chemical.


17. The attached historical purchase order records, entitled "City of Chesapeake – Finance Department - Purchase Order Inquiry" evidence the City's purchases of liquid alum from General Chemicals from November 21, 2000 until June 13, 2005.

18. From November 21, 2000, until June 13, 2005, the City purchased a total of \$1,194,506.00 of liquid alum from General Chemical, rounded to the nearest dollar amount, as evidenced by the attached historical purchase order records retrieved and printed from the City's Mainframe.

  
Tamara Jean Walters

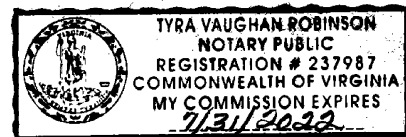
COMMONWEALTH OF VIRGINIA  
CITY OF Chesapeake, to-wit:

I, the undersigned, a Notary Public in and for the City and State aforesaid, do hereby certify that, Tamara Jean Walters, Accountant IV, whose name is signed to this Affidavit, is personally known to me and has acknowledged the same before me in my presence in the City and State aforesaid, this 17<sup>th</sup> day of December, 2018.

  
Notary Public

My commission expires: 7/31/2022

Registration No: 237987



Your claim must  
be postmarked or  
received by:  
**December 17, 2018**

**CLAIM FORM**  
*Liquid Aluminum Sulfate Antitrust Litigation – GEO*  
*Direct Purchaser Settlement*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
info@LiquidAluminumDirectSettlement.com  
[www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com)

**LAL**

**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Settlement Administrator in writing at the address above.

Claimant Name(s) (as the name(s) should appear on check, if eligible for payment). Provide **either** a First and Last Name **or** a Company Name (not both) to whom you would like a check made payable if your claim is eligible for payment. If you provide both, we will use your First and Last Name, not the Company Name:

First Name:

Last Name:

**OR**

Company Name:

City of Decatur

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Keith Alexander

Mailing Address – Line 1: Street Address/P.O. Box:

One Gary K. Anderson Plaza

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

Decatur

State/Province:

IL

Zip Code:

62523

Country:

United States

Daytime Telephone Number:

217/424-2863

Evening Telephone Number:

N/A

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

kalexander@decaturil.gov

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased <u>Directly</u> from a Defendant*	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,346	<input type="checkbox"/>
04/13/2009	11.54	\$ 3,197	<input checked="" type="checkbox"/>
04/17/2009	11.54	\$ 3,197	<input checked="" type="checkbox"/>
04/22/2009	11.17	\$ 3,094	<input checked="" type="checkbox"/>
04/28/2009	11.70	\$ 3,241	<input checked="" type="checkbox"/>
05/04/2009	11.26	\$ 4,774	<input checked="" type="checkbox"/>
05/05/2009	11.73	\$ 4,974	<input checked="" type="checkbox"/>
05/08/2009	11.09	\$ 4,702	<input checked="" type="checkbox"/>
05/11/2009	11.74	\$ 4,978	<input checked="" type="checkbox"/>
05/15/2009	11.28	\$ 4,783	<input checked="" type="checkbox"/>
05/18/2009	11.76	\$ 4,986	<input checked="" type="checkbox"/>
05/19/2009	11.66	\$ 4,944	<input checked="" type="checkbox"/>
05/20/2009	11.15	\$ 4,728	<input checked="" type="checkbox"/>

**\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).**

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART IV - SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**


By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the United States District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V - CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406(a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HERewith ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

  
Signature of claimant

11-29-2018  
Date

Keith Alexander  
Print your name here

City of Decatur  
Company Name

Water Production Manager  
Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

Your claim must  
be postmarked or  
received by:  
**December 17, 2018**

**CLAIM FORM**  
*Liquid Aluminum Sulfate Antitrust Litigation – GEO*  
*Direct Purchaser Settlement*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
info@LiquidAluminumDirectSettlement.com  
www.LiquidAluminumDirectSettlement.com

**LAL**

**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Settlement Administrator in writing at the address above.

Claimant Name(s) (as the name(s) should appear on check, if eligible for payment). Provide **either** a First and Last Name **or** a Company Name (not both) to whom you would like a check made payable if your claim is eligible for payment. If you provide both, we will use your First and Last Name, not the Company Name:

First Name:

Last Name:

**OR**

Company Name:

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Mailing Address – Line 1: Street Address/P.O. Box:

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

State/Province:

Zip Code:

Country:

Daytime Telephone Number:

Evening Telephone Number:

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased <u>Directly</u> from a Defendant*	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,346	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>

**\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).**

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**PART IV - SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the United States District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V - CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HERewith ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

  
Signature of claimant

14 November 2018  
Date

Leath DRAKE  
Print your name here

City of East Moline  
Company Name

Director of Water & Wastewater Facilities  
Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

Your claim must  
be postmarked or  
received by:  
**December 17, 2018**

**CLAIM FORM**  
*Liquid Aluminum Sulfate Antitrust Litigation – GEO*  
*Direct Purchaser Settlement*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
info@LiquidAluminumDirectSettlement.com  
www.LiquidAluminumDirectSettlement.com

**LAL**

**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Settlement Administrator in writing at the address above.

Claimant Name(s) (as the name(s) should appear on check, if eligible for payment). Provide **either** a First and Last Name **or** a Company Name (not both) to whom you would like a check made payable if your claim is eligible for payment. If you provide both, we will use your First and Last Name, not the Company Name:

First Name:

Last Name:

**OR**

Company Name:

**CITY OF MATTOON WATER**

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

**DAVID BASHAM**

Mailing Address – Line 1: Street Address/P.O. Box:

**2941 LAKE ROAD**

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

**MATTOON IL**

State/Province:

**IL**

Zip Code:

**61938**

Country:

**USA**

Daytime Telephone Number:

**217-234-2454**

Evening Telephone Number:

**217-235-3239**

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

**Bashamd@mattoonillinois.org**

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART IV - SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the United States District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V - CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:** ☐

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HERewith ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

Signature of claimant  Date 09/04 2018

Print your name here David Basham

Company Name City of Mattoon Water

Capacity of Person Signing WTP Supor

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**Your claim must  
be postmarked or  
received by:  
December 17, 2018**

**CLAIM FORM**  
*Liquid Aluminum Sulfate Antitrust Litigation – GEO*  
*Direct Purchaser Settlement*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
info@LiquidAluminumDirectSettlement.com  
[www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com)

**LAL**

**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Settlement Administrator in writing at the address above.

Claimant Name(s) (as the name(s) should appear on check, if eligible for payment). Provide **either** a First and Last Name **or** a Company Name (not both) to whom you would like a check made payable if your claim is eligible for payment. If you provide both, we will use your First and Last Name, not the Company Name:

First Name:

Last Name:

**OR**

Company Name:

City of Elgin : Water Dept

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Eddie Ramos

Mailing Address – Line 1: Street Address/P.O. Box:

150 Dexter Ct

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

Elgin

State/Province:

IL

Zip Code:

60120

Country:

USA

Daytime Telephone Number:

847-931-6160

Evening Telephone Number:

224-239-4286

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

ramos-e@cityofelgin.org

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

Page 3

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**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

<b>Date of Purchase</b>	<b>Quantity of Alum Purchased <u>Directly</u> from a Defendant*</b>	<b>Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)</b>	<b>Proof of Purchase Enclosed</b>
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,346	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>
__/__/__		\$ _____	<input type="checkbox"/>

**\*In the event that different quantity measurements appear on your invoice(s)/other record(s), you should default to dry tons if that measurement appears on your invoice(s)/other record(s).**

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff.

**REMINDER CHECKLIST**

1. Please sign the above certification.
2. Remember to attach only **copies** of acceptable supporting documentation as these documents will not be returned to you.
3. Please do not highlight any portion of the Claim Form or any supporting documents.
4. Keep copies of the completed Claim Form and documentation for your own records.
5. The Settlement Administrator will acknowledge receipt of your Claim Form by mail, within 60 days. Your claim is not deemed filed until you receive an acknowledgement postcard. **IF YOU DO NOT RECEIVE AN ACKNOWLEDGEMENT POSTCARD WITHIN 60 DAYS, PLEASE CALL THE SETTLEMENT ADMINISTRATOR TOLL FREE AT 1-855-338-6128.**
6. If your address changes in the future, or if this Claim Form was sent to an old or incorrect address, please send the Settlement Administrator written notification of your new address.
7. If you have any questions or concerns regarding your claim, please contact the Settlement Administrator at the above address, toll-free at 1-855-338-6128, by email at [info@LiquidAluminumDirectSettlement.com](mailto:info@LiquidAluminumDirectSettlement.com) or visit [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com).

**THIS CLAIM FORM MUST BE MAILED BY PREPAID, FIRST-CLASS MAIL, OR SUBMITTED ONLINE AT [WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM](http://WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM), POSTMARKED OR RECEIVED NO LATER THAN DECEMBER 17, 2018.**

A Claim Form received by the Settlement Administrator shall be deemed to have been submitted when posted, if a postmark date on or before December 17, 2018 is indicated on the envelope and it is mailed First Class, and addressed in accordance with the above instructions. In all other cases, a Claim Form shall be deemed to have been submitted when actually received by the Settlement Administrator.

**It will take a significant amount of time to fully process all of the Claim Forms. Please be patient.**

**PART IV - SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

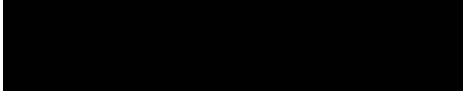
By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the United States District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V - CERTIFICATION**

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UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HERewith ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE

  
Signature of Claimant

12/17/18  
Date

Eddie Ramos  
Print your name here

City of Elgin  
Company Name

Assistant Water Superintendent  
Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**Your claim must be  
postmarked by:  
NOVEMBER 7, 2019**

*Liquid Aluminum Sulfate Antitrust Litigation –  
USALCO Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
[www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com)

**UAL**

**PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you MUST notify the Settlement Administrator in writing at the address above.

Claimant Names(s) (as the name(s) should appear on check, if eligible for payment):

City of West Chicago

Company

City of West Chicago

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Michael Guttman

Mailing Address – Line 1: Street Address/P.O. Box:

475 Main Street

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

City:

West Chicago

State/Province:

Illinois

Zip Code:

60185

Country:

United States

Daytime Telephone Number:

(630) 293 - 2200

Evening Telephone Number:

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

mguttman@westchicago.org

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

<b>Date of Purchase</b>	<b>Quantity of Alum Purchased Directly from a Defendant</b>	<b>Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)</b>	<b>Proof of Purchase Enclosed</b>
MM/DD/YYYY	EXAMPLE: <u>XX</u> TONS	\$12,345	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>
<u>  </u> / <u>  </u> / <u>  </u>		\$ <u>                    </u>	<input type="checkbox"/>

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Incorporated, American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, and Kenneth A. Ghazey.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART IV – SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

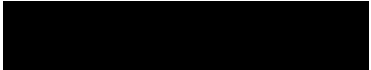
By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V – CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:**

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HEREWITH ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

  
Signature of claimant

7/23/19  
Date

Michael Guttman

Print your name here

\_\_\_\_\_  
City of West Chicago

\_\_\_\_\_  
Company Name

\_\_\_\_\_  
City Administrator

\_\_\_\_\_  
Capacity of Person Signing

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

Your claim must be  
postmarked by:  
**NOVEMBER 7, 2019**

*Liquid Aluminum Sulfate Antitrust Litigation –  
USALCO Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
1-855-338-6128  
[www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com)

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**CLAIM FORM FOR SETTLEMENTS WITH USALCO, SII AND AMERICAN SECURITIES**

**IMPORTANT: PLEASE READ BEFORE COMPLETING THIS CLAIM FORM**

To be eligible for a payment from these Settlements, you must be a Direct Purchaser Settlement Class Member, *i.e.*, you must have purchased liquid aluminum sulfate (“Alum”) in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.

This Claim Form must be completed and returned by Direct Purchaser Settlement Class Members who seek to receive a payment from partial settlements (“Settlements”) in the action captioned *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD) (“Action”).

THIS CLAIM FORM MUST BE COMPLETED AND MAILED BY PREPAID, FIRST-CLASS MAIL TO THE ABOVE ADDRESS, OR SUBMITTED ONLINE AT [WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM](http://WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM), POSTMARKED OR RECEIVED NO LATER THAN NOVEMBER 7, 2019 IN ORDER TO BE ELIGIBLE TO RECEIVE A SHARE OF THE NET SETTLEMENT FUND IN CONNECTION WITH THE SETTLEMENTS. IF YOU PREVIOUSLY SUBMITTED A CLAIM FORM WITH RESPECT TO THE SETTLEMENT WITH GEO, KEMIRA OR CHEMTRADE, IT IS NOT NECESSARY TO FILE AN ADDITIONAL CLAIM FORM TO PARTICIPATE IN THE SETTLEMENTS WITH USALCO, SII AND AMERICAN SECURITIES.

FAILURE TO SUBMIT YOUR CLAIM FORM BY THE DATE SPECIFIED ABOVE WILL SUBJECT YOUR CLAIM TO REJECTION AND MAY PRECLUDE YOU FROM BEING ELIGIBLE TO RECEIVE ANY MONEY IN CONNECTION WITH THE SETTLEMENTS.

**DO NOT MAIL OR DELIVER YOUR CLAIM FORM TO THE COURT, THE PARTIES, OR THEIR COUNSEL. SUBMIT YOUR CLAIM FORM ONLY TO THE SETTLEMENT ADMINISTRATOR AT THE ADDRESS SET FORTH ABOVE.**

If you have questions regarding your Claim Form, please call 1-855-338-6128 or email [info@liquidaluminumUSALCOsettlement.com](mailto:info@liquidaluminumUSALCOsettlement.com). Members of the Direct Purchaser Settlement Class who do not timely and validly seek exclusion from the Direct Purchaser Settlement Class in accordance with the instructions set forth in the Notice will be bound by the judgment entered approving these Settlements as to USALCO and SII regardless of whether they submit a Claim Form.

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*\*Pages 3, 4 and 5 of this Claim Form must be completed and returned to the Settlement Administrator*

## PART I – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice that accompanies this Claim Form. The Notice describes the proposed Settlements with USALCO, with SII and with American Securities, how Direct Purchaser Settlement Class Members are affected by the Settlements, and the manner in which the Net Settlement Fund will be distributed if the Settlements are approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.
2. **To be eligible for a payment from the Settlements, you must be a Direct Purchaser Settlement Class Member. The Direct Purchaser Settlement Class is defined as all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011.<sup>1</sup>** Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchasers who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.
3. **Important - Please Note:** This Claim Form does not pertain to the settlements involving the indirect purchasers. **DO NOT SUBMIT THIS CLAIM FORM IF YOU ARE AN INDIRECT PURCHASER.**
4. By submitting this Claim Form, you will be making a request to share in the proceeds of the Settlements described in the Notice. **IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER (see definition of Direct Purchaser Settlement Class on page 5 of the Notice), OR IF YOU SUBMITTED A REQUEST FOR EXCLUSION FROM THE DIRECT PURCHASER SETTLEMENT CLASS, DO NOT SUBMIT A CLAIM FORM. YOU MAY NOT PARTICIPATE IN THE SETTLEMENTS IF YOU ARE NOT A DIRECT PURCHASER SETTLEMENT CLASS MEMBER. THUS, IF YOU ARE EXCLUDED FROM THE DIRECT PURCHASER SETTLEMENT CLASS, ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.**
5. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.
6. Please be aware that there are specialized companies that may offer to fill out and file your Claim Form in return for a percentage of the value of your claim. Before you sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Settlement Administrator or Interim DPP Lead Counsel.
7. If the Court approves the Settlements, payments to eligible Direct Purchaser Settlement Class Members will be made after the Court grants final approval to the Settlements, after all appeals are resolved, and after the completion of all claims processing. This process could take substantial time. Please be patient.
8. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator, at the above address or by toll-free phone at 1-855-338-6128, or you may download the documents from the website [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com). You may also contact Interim DPP Lead Counsel, James E. Cecchi, Esq., Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., 5 Becker Farm Road, Roseland, NJ 07068; 973-994-1700.

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<sup>1</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Incorporated, American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, and Kenneth A. Ghazey.

**Your claim must be  
postmarked by:  
NOVEMBER 7, 2019**

*Liquid Aluminum Sulfate Antitrust Litigation –  
USALCO Direct Purchaser Settlements*  
c/o Settlement Administrator  
P.O. Box 30097  
Philadelphia, PA 19103  
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## **PART II – CLAIMANT INFORMATION**

The Settlement Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Settlement Administrator in writing at the address above.

Claimant Names(s) (as the name(s) should appear on check, if eligible for payment):

City of Chicago

Company

City of Chicago

Name of Person the Settlement Administrator Should Contact Regarding this Claim Form (Must Be Provided):

Diane Pezanoski, Deputy Corporation Counsel

Mailing Address – Line 1: Street Address/P.O. Box:

30 North LaSalle

Mailing Address – Line 2 (If Applicable): Apartment/Suite/Floor Number:

Suite 1400

City:

Chicago

State/Province:

Illinois

Zip Code:

60602

Country:

United States of America

Daytime Telephone Number:

(312) 744-6996

Evening Telephone Number:

(312) 744-6996

Email address (E-mail address is not required, but if you provide it you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.):

Diane.Pezanoski@cityofchicago.org

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM****PART III – SCHEDULE OF QUALIFYING ALUM PURCHASES**

In the chart below, please report separately each of your purchases of Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011 (attach additional pages if necessary).<sup>2</sup> In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States. Foreign transactions where billing and shipping took place outside of the United States do not qualify. Please attach copies of your purchase order(s), invoice(s), or other documentation of your purchase(s). For each purchase of Alum listed below, please include the quantity of Alum purchased, the dollar amount (in U.S. dollars) of purchases made directly from a Defendant during the relevant time period, and the date of each purchase. Amounts should be rounded to the nearest dollar. (Example: \$12,345.67 should be entered as \$12,346.) Do not include transportation charges, rebates, refunds, credits, etc.

Date of Purchase	Quantity of Alum Purchased Directly from a Defendant	Dollar Amount (in U.S. dollars) of Alum Purchase (excluding any transportation charges, rebates, refunds, credits, etc.)	Proof of Purchase Enclosed
MM/DD/YYYY	EXAMPLE: XX TONS	\$12,345	<input type="checkbox"/>
___/___/___	Please see attached.	\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>
___/___/___		\$ _____	<input type="checkbox"/>

The Net Settlement Fund will be allocated to eligible Direct Purchaser Settlement Class Members on a pro rata basis based on the total dollar value of each Direct Purchaser Settlement Class Member's purchase(s) of Alum in the United States directly from a Defendant during the relevant time period to the total dollar value of all valid claims submitted.

<sup>2</sup> Defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Incorporated, American Securities, Inc., Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, and Kenneth A. Ghazey.

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**PART IV – SUBMISSION TO JURISDICTION OF THE DISTRICT COURT**

By signing below, you are verifying that:

1. You have provided genuine documentation to support your claim and agree to provide additional information to Interim DPP Lead Counsel or the Settlement Administrator if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of Alum and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the District Court for the District of New Jersey, where this Action is pending, for purposes of resolving any issues related to or arising from your claim.

**PART V – CERTIFICATION**

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the IRS that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me (us) that I am (we are) no longer subject to backup withholding. **NOTE: If you have been notified by the IRS that you are subject to backup withholding, completely fill in this bubble:**

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HERewith ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

Signature of Claimant

Date

*Reshma Soni*

*11/5/19*

Print your name here

Company Name

Capacity of Person Signing

*City of Chicago*

*Comptroller*

**YOU MUST COMPLETE AND RETURN THIS PAGE OF THE CLAIM FORM**

**REMINDER CHECKLIST**

1. Please sign the above certification.
2. Remember to attach only **copies** of acceptable supporting documentation as these documents will not be returned to you.
3. Please do not highlight any portion of the Claim Form or any supporting documents.
4. Keep copies of the completed Claim Form and documentation for your own records.
5. The Settlement Administrator will acknowledge receipt of your Claim Form by mail, within 60 days. Your claim is not deemed filed until you receive an acknowledgement postcard. **IF YOU DO NOT RECEIVE AN ACKNOWLEDGEMENT POSTCARD WITHIN 60 DAYS, PLEASE CALL THE SETTLEMENT ADMINISTRATOR TOLL FREE AT 1-855-338-6128.**
6. If your address changes in the future, or if this Claim Form was sent to an old or incorrect address, please send the Settlement Administrator written notification of your new address.
7. If you have any questions or concerns regarding your claim, please contact the Settlement Administrator at the above address or toll-free at 1-855-338-6128 or visit [www.liquidaluminumdirectsettlement.com](http://www.liquidaluminumdirectsettlement.com).

**THIS CLAIM FORM MUST BE MAILED BY PREPAID, FIRST-CLASS MAIL, OR SUBMITTED ONLINE AT [WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM](http://WWW.LIQUIDALUMINUMDIRECTSETTLEMENT.COM), POSTMARKED OR RECEIVED NO LATER THAN NOVEMBER 7, 2019.**

A Claim Form received by the Settlement Administrator shall be deemed to have been submitted when posted, if a postmark date on or before November 7, 2019 is indicated on the envelope and it is mailed First Class, and addressed in accordance with the above instructions. In all other cases, a Claim Form shall be deemed to have been submitted when actually received by the Settlement Administrator.

**It will take a significant amount of time to fully process all of the Claim Forms. Please be patient.**